

Porirua City Council Proposed District Plan
Ngāti Toa Rangatira Speaking Points for Hearing Stream 4
Three Waters Chapter

Ka oho te wairau

Ka mataara te tinana

He aroha ki te aroha

Ka kaa te rama

Tihei Mauriora

Tenei te mihi atu kia koutou katoa

Ko wai au? Ko Naomi Solomon toku ingoa. He Pou Toa Matarau ki Te Rūnanga o Toa Rangatira.

Kia ora. My name is Naomi Solomon. My role is Pou Toa Matarau at Te Rūnanga o Toa Rangatira.

My submission today will focus on the Three Waters Chapter of the Proposed District Plan, though I am happy to answer any questions on other topics being heard in this hearing stream.

Firstly, I would like to thank Porirua City Council for working with Ngāti Toa on the PDP. It has been a long process with people changes throughout that time. As is common with personnel changes, it often takes time to bring people up to speed with what has been previously discussed and agreed on, and building new relationships takes time.

The objectives of the Three Waters Chapter focus on:

- Hydraulic neutrality; and
- Three Waters Network capacity

I intend to make submissions on both of these points, noting that the chapter largely focuses on water volume, rather than water quality (which we understand largely sits within the jurisdiction of Greater Wellington Regional Council).

Hydraulic Neutrality

On the topic of hydraulic neutrality, I note that:

1. The definition talks to the management of stormwater from new lots or developments.
2. We are supportive of the definition including on-site disposal or storage as this places the onus on developers to think about the management of stormwater as part of their developments.
3. However, we are unclear on details of how this should be achieved and point this out as we believe that innovative solutions to stormwater management need to be considered across our city if we are to modernise the way our three waters infrastructure is managed now and into the future.
4. We would have preferred that water-sensitive design provisions were explicitly included in the plan, though we note that this is being promoted through the requirements for hydraulic neutrality and compliance with the Wellington Water Regional Standard for Water Services.

5. The PDP acknowledges that requiring hydraulic neutrality can assist in minimising the discharge of stormwater contaminants into water bodies.
6. However, we have concerns around the concept of hydraulic neutrality, as this does nothing to stem the current flow of stormwater which already inundates and infiltrates the wastewater system and is the cause of overflows into our streams and harbour, thereby creating water quality issues.
7. The proposed policies do not respond to how this will be resolved, or by who. Who is responsible for ensuring that the volume of stormwater runoff does not have negative impacts on our precious water bodies?
8. In Porirua, even slight rain events can cause wastewater overflows given the current state of the stormwater and wastewater networks. However, we know that with climate change, we will see more extreme weather events that will only lead to exacerbation of the volumes of water that we currently need to deal with.
9. In short, the definition of hydraulic neutrality essentially means that developers cannot make things any worse than they already are. But the system is currently broken. What we are saying is that the concept of hydraulic neutrality does nothing to turn the dial to make things better.

Network Capacity

On the topic of network capacity, I note that:

1. The move by Porirua City Council to tackle poor three waters infrastructure is positive. The objective outlined in the plan goes some way to try to meet the concerns I raised in relation to hydraulic neutrality in that it speaks to having sufficient capacity to accommodate the resulting demand.
2. However, as noted above, it talks to 'resulting demand' of which I understand means 'the new stuff'. It does nothing to address the 'current stuff'.
3. It is unfortunate to see that the framework proposed is focused on the number of houses and the demand, rather than on encouraging best practice around how a site can and should be improved.
4. However, we believe that placing the onus of responsibility for water quality solely on the Regional Council is short-sighted given the:
 - a. interrelationship of the water cycle,
 - b. the upcoming plan changes that GWRC will undertake,
 - c. the impending three waters law reform,
 - d. the inclusion of the concept of te mana o te wai in the NPS-FM,
 - e. the release of the Te Awarua-o-Porirua Whaitua implementation plan in 2019 alongside the Ngāti Toa Statement, and
 - f. the mahi that Ngāti Toa and Porirua City Council has been working on together to ensure that Porirua is a harbour centred city.
5. We see the planning system at both a district and regional level as being a package or suite of rules and regulations that help to address the numerous issues that have a negative impact on our environment. The system also empowers or enables development to occur in a manner that provides for good environmental outcomes.
6. We believe that this is addressed in part by strategic direction FC-O1 which talks to infrastructure needing to be adequately enabled to provide for the effective, efficient safe and resilient functioning city, including supporting a high standard of living, and having sufficient capacity to accommodate existing and planned growth.
7. However, we do believe that the three waters chapter could better reflect the interrelated nature and responsibilities of Porirua City Council, Greater Wellington Regional Council and Wellington Water.

Mr Smeaton's Report

I understand that Mr Smeaton's report recommends amendments to the chapter, and that in relation to our written submission, it looks to recognise the mauri of Porirua's waterways, Te Awarua-o-Porirua and Te Moana-o-Raukawa and that this continues to be compromised.

1. We thank Mr Smeaton for his willingness to suggest this amendment and understanding that the recognition of the effects on te mauri o te wai is consistent with the Tangata Whenua Strategic Objective.
2. This is relevant to the topic of stormwater contaminant discharges to water bodies. It is this practice (alongside others), at the scale in which it takes place, across our city, which has an impact on te mauri o te wai.
3. I understand, Mr Chair, that you had a question about the additional wording, and the somewhat incompleteness of the sentence that is proposed.
4. I agree that it is incomplete and that speaking of mauri being compromised doesn't quite fit. Particularly given that the chapter looks to address water volume issues, rather than water quality issues.
5. If I could, I would suggest that the chapter simply recognises that it is a step towards maintaining the mauri of Porirua's waterways, Te Awarua-o-Porirua and Te Moana-o-Raukawa.

We would like to see a plan that is enabling and provides for development, but in a way that ensures not only protection, but improvement of our environment. While we understand that there are limitations on the ability of the PDP to be able to do this given that planning standards are developed at a national level, we would encourage Porirua City Council and the Panel to ensure that this plan, particularly in relation to three waters, is bold and innovative. We don't need more of the same. And bigger pipes and giant retention tanks are not the only solution. We know that with the proposed reform heading towards us, changes in the way that the network is managed will happen. We take the view that we are at a point in time where we can and should make the step changes required to ensure that our systems are fit for purpose, modern and innovative for now and for future generations.

Tena koutou, tena koutou, tena koutou katoa.