

Owhiro Bay Residents Association

Submission to WCC Long Term Plan

9 May 2021

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Introduction

Who are we submitting on behalf of:

This submission has been prepared by the Owhiro Bay Residents Association (OBRA) committee. We have consulted with a variety of groups and individuals in the catchment but have not had time between writing and submitting to fully consult with the community. Our views however reflect long-standing community positions.

We are part of and have consulted with the Owhiro Catchment Collective(OCC) and fully support their

submission to the Long Term Plan.

Before outlining the details of our submission to the Long Term Plan we believe it is important to comment on the broad approach that the Council appears to be taking, and the concerns we have with its direction.

We don't want the legacy we pass to the next generation to reflect our failure to make hard decisions now.

In this regard the Council and the Long Term Plan process is significantly out of step with the wants and aspirations of the community it represents.

1. There are major failures in the infrastructure which holds the city together. We acknowledge the significant amount of investment required to make these a strong infrastructure platform for the City to grow. But we believe it is time to fix what needs fixing and not pass this off to another generation.
2. We need this LTP to not only set the direction for change but also articulate how the path will be navigated. Co-design with the community and ensuring the community is actively engaged in decision-making stages is imperative.

Decision 1: Increasing investment to fix the water pipes

The issue: There is insufficient detail in the documentation we have seen to take a clear position of the respective merits of Options 2 versus Option 3. This applies both to our catchment, Owhiro, and the wider city, particularly outside the CBD.

Our Recommendations:

1. **Owhiro Catchment. Resource the Owhiro Pilot to ensure it achieves its objective as being the prototype for successful citywide multiparty processes that restore 3 water networks to a sound state that no longer degrade waterways. Confirm that there is adequate funding to successfully and rapidly fix public and private pipe failures to ensure the Owhiro Stream and the Tapu Teranga Marine Reserve at Owhiro Bay are made fit for primary contact within a couple of years.**
2. **The network outside the critical assets in the CBD. Fund water infrastructure renewals and upgrades to a level that ensures that the entire network is made fit-for-purpose in the coming years.**
3. **Ensure training and recruitment systems are in place to achieve these goals.**
4. **Resource appropriately to ensure the recommendations of the Mayoral Taskforce, particularly around resilience and water-sensitive urban design are implemented.**

Owhiro Catchment: funding to fix the pipes

Funding for the Owhiro Catchment and the Owhiro Pilot have been recognized by WCC, including in the Mayoral Taskforce on the 3 waters, as a project of high priority for the city and the region. The Owhiro Catchment has been chosen by WCC and WWL to be the site of the first roving crew/Know Your Pipes team and as such needs to be addressed quickly and successfully if the city is to succeed in improving water quality in the city's waterways and beaches in line with the NPS-FM.

We need to improve water quality in our streams and bays to a level that is fit for primary contact. Meeting the NPS-FM is a responsibility that must be shouldered. Wellington's water infrastructure needs to be addressed at a level well above Business As Usual.

The City's Chief Infrastructure Officer has confirmed that there is funding to undertake both investigations and repairs of failed or failing assets in the Owhiro catchment. However, should major failures be uncovered, they will require additional funding, more in line with Option 3 than Option 2.

Option 3 states under the Wastewater section: "After investigations and a \$391m renewals programme, we would be able to invest to reduce sewage pollution, starting with catchments around the central city, Karori and Owhiro Bay, then widening into other catchments." This is not included in option 2. This wording is problematic if the City is committed to the Owhiro Pilot and needs to be amended.

The Network outside the CBD and most critical assets

The issue we have with the current preferred option: The consequential difference between options 2 and 3 is unclear but given the difference in the amount of money (moderate increase under 2, significant under 3), it is likely that the CBD's assets will receive the necessary attention but that the suburbs may be left to tread faecally-contaminated water.

Our position is that we need greater clarity in the Long Term Plan around funding commitments to the network further out from the CBD and ensure that funding will result in transformative change.

Option 2 is a politically safer option as it won't generate as much kick-back from concerned ratepayers but if we want to solve these problems we need to help the community have greater transparency around the implications of not spending sufficient money to modernise our network through a well-funded renewals programme.

Under Option 2 it is likely that, 30 years down the track, our network will still be aged, particularly outside the CBD, and that over the coming 30 years risks of major failures, excluding the critical assets identified and addressed, will remain significant.

Option 3 is closer to an outcome where, in 30 years time, the renewal programme will have caught up

and kept pace with ongoing degradation of pipes. Therefore this option is more aligned to a strategic focus for Wellington, rather than a tactical one which is Option 2.

The environment should not be left to suffer from failing assets and future generations should not shoulder an unfair share of the burden.

Training, recruitment and scaling up

WCC officer (Baz) told the Island Bay Residents Association on 3 May 2021 that a key reason that option 2 is preferred to option 3 is that there just aren't enough suitable people who can be recruited to undertake the scale of activity Option 3 would trigger.

We recommend that WCC be more ambitious and determined to fix the problems and this will clearly require a significant investment in training and recruitment resources. We support the establishment of regional or national training centres to train a new corp of water industry personnel.

WCC could also consider engaging with the Universities to see what science students could be sponsored to work with the council through their current projects and then in the organisation once their degree is completed.

We appreciate that it will be a massive challenge to the industry nationally, including WWL, to scale up to a level commensurate with the requirements. The human resources challenges are not insurmountable but they require focus and budget from the city. Scaling up will realistically need to be staged but we **have** to be ambitious.

WWL has succeeded in significant growth in capex spending around renewals in the last couple of years and this upswing in spending will need to be supported with access to more staff and equipment. Ensure WCC and WWL are resourced to work with other Councils, other industry groups and central government to build better career paths in water, increase local production of valves and other equipment that are currently dependent on vulnerable overseas supply chains.

Investing in actioning the Mayoral Taskforce on 3 Waters recommendations

The Mayoral Taskforce Report on The Three Waters makes a number of recommendations that will improve outcomes for the environment and for resilience. These need to receive greater attention and funding to progress. These include but are not limited to progress around: resiliency, changes to new build requirements, support water efficient use by residents.

We support the recommendations, including:

1. Smart meters: continue the investigation of this important piece of green infrastructure. Ensure better community engagement and discussion of equity and guaranteed public ownership. We appreciate this is a contentious issue for our city.
2. Targeted rates: introduce a system similar to the one recently introduced by Porirua City Council to support home owners with repair work required to improve the private 3 water network.
3. MTF Rec 19: Task and fund WWL to develop a road-map for consideration in the 2024/34 LTP to achieve compliance with NPS-FWM.
- 4 MTF Rec 17: Establish suite of policy including rainwater harvesting and storage.
- 5.MTF Rec 8: Change district plan so all new land development consents are required to improve stormwater effects.
6. MTF Rec 9: Catchment scale planning.
7. MTF Rec 10. Green infrastructure.
8. We support the development of a WOF (Warrant of Fitness) system for 3 water pipes that would be part of all private house sales. This measure would drive significant improvements quickly. When houses are sold all laterals need to be inspected and this would generate a report that would appear on the LIM. Water mains would be checked for a leak, laterals checked to ensure they are fit for purpose. The city should require such a report before a sale could finalised.

Decision 4: Te Atakura First to Zero (Climate change)

The issue: Having an initiative for achieving zero carbon emissions is admirable for the council, but the underlying initiatives for how it will be achieved across the wider Wellington region is very light across all sections of Decision 4.

It is noted that Wellington City Council has not addressed Resilience, which should be a STRATEGIC INITIATIVE across all councils and in line with central government actions as well.

In addition, the key impacts of climate change appear to have been either ignored or brushed over lightly e.g. how to look after coastal communities.

Our recommendation: Acknowledge in the LTP that resilience needs to be addressed and will be included in next year's annual plan and subsequent LTPs.

Addressing resilience is a requirement of the impact of Climate Change.

Resilience is critical to how Wellington will manage (survive) after any major event. Given the impact on Wellington after the Christchurch and Kaikoura earthquakes it is surprising that the council has failed to at least address the fact that there needs to be focus on this area including looking at what the most important factors are that the council needs to focus on, such as:

- What tools and systems etc. need to be in place should any communities become isolated from

water/electricity/power after an event

- What will the immediate support systems and then the medium-to-permanent fix approaches be?
- What capabilities need to be in place to support communities? How will the current emergency services support our communities?

It is noted that there are a few random notes on Resilience i.e. page 27 Increasing neighbourhood resilience. This looks like an initiative that could be reused across many communities yet there has been little or no engagement with other communities, for which the Owhiro catchment is one that would be interested in this.

We need WCC to advise what they plan to do to address resilience as a strategic initiative, including: community engagement, working with central government, working with key suppliers to understand what resilience they have in place (electricity for example), etc.

Owhiro Bay

The issue: WCC and the Owhiro Community have participated in the eCoast coastal engineering assessment project and are now in receipt of the report. The City needs to have a more consistent and strategic approach to preparing the City's coastlines and their communities for climate change mitigation.

Our recommendation:

- 1. We request support to improve our community's resilience programme, including, as recommended by eCoast's report:**
 - **Grading of the beach**
 - **Capturing of sea movement (camera installation and video retention) to support longer term options to mitigate the impact of sea movement**
 - **Investigations on structural improvements in the footpaths and sea walls.**
 - **Hardening the resilience at critical points of the bay, including the bridge. The bridge is a critical, vulnerable asset that needs serious assessment in consultation with the community to ensure the gateway to Red Rocks/Te Kopahou is secure.**

We note in correspondence from WCC there is a concern that support for our request could be seen as setting a precedent for future coastal community requirements. However, precedence has already been set through the work in Lyall Bay, fixing of the Island Bay sea wall and the 'new' sea wall in front of the Victoria University research centre. If a precedent had not already been set, it should have been, as the entire Wellington south coast is an area of risk that must be addressed by a holistic resilience strategy

- 2. We request support for short and long term budgeting, in the LTP, for at least the following:**

Opex: \$100k for year one to fund further investigations of structural support in the bay, grading of the beach, installation of cameras and retention of video data

Ongoing year on year budget of approx. \$30,000 for beach grading.

Capex: to be noted that capex needs to be budgeted for:

- in next three years for roading/sea wall improvements
- in next 10-15 years potential artificial reef installation.

Decision 7 of WCC LTP 2021

The Issue: Sludge and Waste Water MUST been seen as a strategic initiative for the long-term benefit of all Wellingtonians and accounted for in the LTP accordingly, which it is not today.

Our Recommendations:

1. OBRA wants to see sludge decoupled from the landfill and agrees with the preferred Option 4 – Moa Point treatment of sewage sludge funded externally through the Infrastructure Funding and Finance Act 2020.
2. However, this is a loan, not a grant. It should be made clear in the LTP that the funding is to be paid back via these levies and that the levy will carry on for 30 years. This is passing the cost on to future rate-payers.
3. Where is the budget allocated for spending within the next three years to ensure WCC acquires funding for the Moa Point project? Is there budget for spending on all the applications, documents/lawyers etc, to ensure this goes ahead and gets funding for the SPV?
4. Audit NZ has indicated there is a risk to this IFF funding coming through. We understand from WCC that this risk is slight, but if it fails then we do not want to see the project cancelled or curtailed. Option 3 must be selected and an alternative way of funding will be necessary. Ways of doing this might be:
 - a) Prioritising this over less essential infrastructure projects such as cycleways
 - b) Using the amount budgeted for extending the Southern Landfill, which cannot go ahead unless the sludge is treated and minimised, or
 - c) Using some of the budget allocated for the Three Waters pipes work which the Auditor believes cannot be fully used due to lack of resources.
5. We need better clarity in the LTP on how the environmental impact of the landfill fits in with WCC's zero-waste vision. There must be a strategic plan covering waste in general – not just the sludge - which addresses the future of the Southern Landfill and indeed all other Wellington landfills. In the absence of any such plan it seems that the Southern Landfill will continue by default indefinitely. We do not want to see the situation that, as other Wellington landfills reach capacity and are closed, their waste is redirected to the Southern Landfill.

The latter is no longer a suitable place for waste as it is in an increasingly populated area and this causes problems, eg:

- a) trucks converging on it from all parts of the city, bottlenecking through Brooklyn and down Happy Valley (where the permanently pot-holed road is a danger to cyclists and needs to be re-structured to a higher spec)
 - b) environmental destruction of stream ecology
 - c) danger of predators to Zealandia and pests to households.
6. We need to ensure that the Moa Point project, any resource consent applications and possible extension of the landfill, all move in lock-step with waste minimisation, and that the community is fully consulted at every step of the journey.
 7. We want to see a concrete plan for reducing waste, including such things as recycling centres, re-use of C&D, banning/restricting plastic in supermarket packaging. We think this should be at a regional level, coordinated by GWRC; we have submitted to that effect on their LTP.
 8. The council should look at urgently changing building regulations and RCs to reduce waste as the intensification of the city centre goes ahead, and thus help make Wellington greener. All building and demolition work should be directed to conform to strict recycling rules.
 9. We recommend that a state-of-the-art recycling centre is built at the Southern Landfill C & D site – which should be a condition of the new C&D lease which is imminently due to expire. In this scenario it will not be an expense for the council/rate payer. Again, this should form part of a strategic initiative for the long term benefit of Wellingtonians, none of which is covered under this LTP.
 10. Proposed Fees and Charges:
At the Landfill why is commercial disposal cheaper than domestic?
We believe that the sewage sludge fee could be much higher to reflect the need to forward-pay for pipe repairs and new technologies.

Please read the Owhiro Catchment Collective (OCC) submission to this Long Term Plan which has been prepared in consultation with our Association. We append it to this document.

Other recommendations

Road Surfaces and road calming measures

The Issue: Happy Valley Road is heavily used by trucks using the three landfills. The road surface is in poor repair and is not of a standard suitable for these levels of use. The footpath is in a very poor state of repair.

Our recommendation: There needs to be a clear plan, budgeted and timelined to address the needs of all road users, including cyclists. We believe waste minimisation will reduce road use by trucks. See our recommendations for Decision 7. Historically, the landfill sites were poorly chosen and we should be making every effort to limit the volume and sources of material making its way through the city and up Brooklyn Hill.

The Issue: The south side of Owhiro Bay is part of the Marine Reserve and a destination for growing numbers of visitors. It is a dead-end stretch of road which is narrow. Traffic speed needs to be slowed.

Our recommendation: Funding traffic calming measures that recognise the special status of the bay and the community as part of Te Kopahou/Tapu Teranga.

Appendix

10 May 2021

Submission by Ōwhiro Catchment Collective on Wellington City Council (WCC) Draft Long-Term Plan (LTP)

1. The Ōwhiro Catchment Collective (OCC) is a vehicle for coordinating the actions of and advocacy by a group of community organisations which focus on issues relevant to the catchment of the Ōwhiro Stream:
 - 1.1 Ōwhiro Bay Residents Association
 - 1.2 Stream Team
 - 1.3 Southern Environmental Association
 - 1.4 Friends of Ōwhiro Stream (FOOS)
 - 1.5 Friends of Taputeranga Marine Reserve.
2. The purpose of this submission is to highlight matters of common concern to the members of the OCC. Individual members may make their own submissions providing more detail and/or addressing different matters.
3. OCC would also like the opportunity to speak to its submission.

Background

4. OCC is a coalition of community groups who are connected to the Ōwhiro catchment and share a vision of a thriving ecological corridor from the border with Zealandia to Taputeranga Marine Reserve in the south. This includes improving the water quality of the Ōwhiro Stream and its tributaries and improving habitat and native biodiversity of the catchment.
5. OCC's member groups are active in the catchment restoring habitat, planting, controlling weeds and trapping predators. Organisations such as FOOS have a long history of advocacy for the catchment. Despite a huge investment of volunteer hours and effort, the catchment continues to face many challenges. These include the landfills located within the catchment and the ongoing issues with wastewater infrastructure and stream contamination. Many of the decisions in the LTP have significant implications for the health of our catchment.

6. OCC promotes a catchment-wide approach to addressing the environmental issues in the Ōwhiro catchment that recognises its values and unique place in Wellington's geography. OCC supports the establishment of the Ōwhiro Pilot multi-party working group consisting of WCC, Greater Wellington Regional Council, Wellington Water Ltd, the Department of Conservation and Regional Public Health working together on common issues. We would like this to grow and extend to the development and adoption of an integrated catchment management plan to monitor and improve the water quality of Ōwhiro Stream in partnership with community groups and mana whenua.

Community outcomes

7. WCC's proposed community outcomes include:

- 7.1 *"Environmental — A sustainable, climate friendly eco capital — A city where the natural environment is being preserved, biodiversity improved, natural resources are used sustainably, and the city is mitigating and adapting to climate change — for now and future generations."*

The Ōwhiro catchment is an important part of Wellington's environment. It contains one of the few remaining wild daylighted streams in our urban environment. It adjoins and provides a corridor between Zealandia and the Taputeranga Marine Reserve. Water from the Ōwhiro Stream discharges into the Marine Reserve.

- 7.2 *"Social — A people friendly, compact, safe and accessible capital city — An inclusive, liveable, and resilient city where people and communities can learn, are connected, well housed, safe and healthy."*

The Ōwhiro catchment provides a home for many households and includes three schools and several early learning centres. The Taputeranga Marine Reserve is a destination for diving, swimming and enjoying the beach. The Ōwhiro Stream runs alongside Ōwhiro Bay School. Zealandia and the south coast are also valuable local and tourist destinations that showcase Wellington's environment.

8. Achieving these community outcomes will require investment in improving water quality and mitigating the impacts of the Ōwhiro catchment landfills so that the Ōwhiro Stream and the marine environment at Ōwhiro Bay are safe for the community to interact with and use.

Key issues of concern

9. Key concerns for OCC are:

- 9.1 Improving the management and treatment of sewage sludge and reduce the volume buried at the WCC Southern Landfill:

- (a) This is essential to reduce carbon emissions from the landfill and enable waste minimisation.

- 9.2 Developing a strategic plan for the future of the WCC Southern Landfill:
- (a) We do not believe the landfill should be extended indefinitely. Doing so will impact the liveability of the Ōwhiro catchment; destroy the natural values of those parts of the Ōwhiro catchment converted to landfill; and lock-in environmental risk to the water quality of the Ōwhiro Stream and Taputeranga Marine Reserve, particularly in the event of a major earthquake.
 - (b) A strategic plan (which includes improving the management of sewage sludge) must be developed and agreed upon with the community **before** consent is sought to expand the landfill.
- 9.3 Improving the management of rubbish entering the environment from the Ōwhiro catchment landfills and from vehicles travelling to those landfills.
- 9.4 Improving the management of the T&T Landfill and addressing its impact on Ōwhiro Stream water-quality.
- 9.5 Adopting measurable targets for improving the water quality of Ōwhiro Stream.
- 9.6 Repairing or renewing wastewater infrastructure to address its impact on Ōwhiro Stream water quality.

Submissions on the proposed 'big decisions'

Spending more money on fixing the water pipes

10. OCC supports investing more on Wellington's three waters infrastructure. The level of detail in the LTP consultation document makes providing feedback on the three options (different levels of capital expenditure) difficult. OCC's key submission on Decision 1 is that the LTP should distinguish between:
- 10.1 investment in new assets (such as reservoirs) and renewals (such as the programmed replacement of pipes); as opposed to
 - 10.2 investment to identify and fix existing problems that are already impacting the water quality of urban waterways such as Ōwhiro Stream.
11. Recommendation 19 of the *Mayoral Taskforce on the Three Waters Report* is:
- Task and fund WWL to develop a road-map for consideration in the 2024/34 LTP that would see WWL (or a future entity) funded to achieve compliance with the National Policy Statement — Freshwater Management by 2040.
12. OCC does not agree that work towards achieving compliance with the National Policy Statement — Freshwater Management (NPS-FM) should wait until after 2024. That is not good enough.

WCC knows its wastewater infrastructure is a cause of reduced water quality. It is not acceptable for WCC to plan for the possibility of water quality continuing to degrade over the next three years.

13. OCC's view is that the LTP should provide for funding to identify and fix existing problems that are already impacting the water quality of urban waterways such as Ōwhiro Stream separately from the capital expenditure provided for by Decision 1.
14. OCC also seeks that WCC:
 - 14.1 fund the Ōwhiro catchment pilot so that it can achieve its objective of being a prototype for successful citywide multiparty processes to restore three waters networks to a sound state that no longer degrade waterways; and
 - 14.2 formally adopt a time-bound and measurable target for improving water quality in the Ōwhiro Stream.

Ownership of wastewater laterals

15. OCC agrees with the Decision 2 preferred option. The model of relying on private owners to care for and renew wastewater laterals has failed. The problem of laterals impacting water quality requires community ownership.

Reducing sewage sludge and waste

16. OCC supports the Decision 7 preferred option with some caveats. It is essential that Wellington's wastewater treatment infrastructure be improved so as to reduce the volume of sewage sludge that cannot be discharged into the Cook Strait. The current way wastewater is managed requires large volumes of sludge to be pumped to the Southern Landfill. This is vulnerable to earthquake damage; results in carbon emissions; and requires even larger volumes of solid waste to be mixed with the sludge before it is buried — which in turn precludes waste minimisation.
17. The caveats include:
 - 17.1 OCC is worried about what happens if the Infrastructure Funding and Financing Act 2020 cannot be used. Waiting another three years to fund improvements at Moa Point is not acceptable. WCC should commit to revisiting its LTP if funding cannot be sourced via the Act.
 - 17.2 OCC is worried about when construction will begin. The LTP consultation document suggests a levy will not need to be collected until year 4. It is not clear when significant capital expenditure on Moa Point improvements will commence. This contrasts with WCC's proposed capital budget for 'Stage 4' of the Southern Landfill, which includes 1,310,000 at year 1; 4,896,000 at year 2; and 7,397,000 at year 3. OCC is strongly opposed to WCC seeking consent for 'Stage 4' of the landfill until a strategic plan for the

landfill (which includes improving the management of sewage sludge) has been developed and agreed upon with the community.

18. OCC will not accept a forever operational and forever expanding WCC landfill in the Ōwhiro catchment.