

6 December 2023

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Hon Penny Simmonds
Minister for the Environment
Parliament Buildings
Wellington

Tēnā koe Minister

Briefing for Incoming Minister – Towards a thriving environment

Congratulations on your appointment as Minister for the Environment. Greater Wellington Regional Council (Greater Wellington) shares your vision of safeguarding our environment while ensuring sustainable land use for economic benefit. We look forward to meeting you soon.

We wish to bring **five** matters to your attention.

- Support and enable the strong connection between environmental protection and quality fit-for-purpose three waters infrastructure.** Time and again our rural and urban communities have told central and local government that clean and plentiful water in our rivers, lakes and streams is fundamental to our wellbeing. This message reflects the poor state of our waterways, with urban streams especially affected by e coli.

Since 2013, Greater Wellington has worked with our mana whenua partners and the community through collaborative Whaitua (Space) Committees to develop water quantity and quality targets, use limits and related work programmes (Whaitua Implementation Programmes) for the five super-catchments of our region. These are at varying stages of implementation.

Robust standards and sustainable funding to underpin water infrastructure investment are indelibly connected to both water quality and quantity. New Zealanders need more focus and priority at all levels of government to achieve the improvements we are all looking for.

- Retain key aspects of the Spatial Planning Act (SPA), and its drive for integration.** Spatial planning and strategies have merit, ensuring that NZ builds and develops in the right place with the right infrastructure. We support the direction that every region has a spatial strategy. These guide and align with infrastructure development and upgrades, especially in relation to water (potable, waste, stormwater, and flood), roads, rail, energy transmission and local power generation.

In Wellington we have our regional planning committee (the Wellington Regional Leadership Committee) with Government Ministers and mana whenua, to develop and deliver our spatial plan (the Future Development Strategy or FDS). Laying out our growth pathway for the next 30 years,

the FDS is an innovative model that both reflects and drives local decision making and integrated planning.

Keeping key principles of the Spatial Planning Act alive in legislation for both the work and the partnership with Government would be extremely valuable.

3. **Keep existing national direction under the national planning framework; extend implementation deadlines.** Greater Wellington acknowledges the Government's intention to replace the National Policy Statement for Freshwater Management 2020 (NPS-FM) and the National Environmental Standards for Freshwater to better reflect the interests of all water users.

We support the key direction of the NPS-FM and we are well into the process of implementation through formal notifications of Plan Changes to our Natural Resources Plan. However, the timeline imposed by the previous Government is unachievable for us, our partners, and the community. We would welcome the opportunity to work with you on a replacement NPS FM, to clarify the regulatory regime and bring all our communities and partners together to clean up and protect our freshwater.

4. **Complete the National Policy Statement on Natural Hazard Decision-making:** This is critical to direct planning authorities on the appropriate weight to attach to natural hazard risk in planning decisions relating to new development. It also sets direction in making adaptation planning a requirement for councils. The lack of direction at present means development is being permitted in harm's way. This will add to the cost of adaptation and is not in the long-term national interest.
5. **Replacement for the Natural and Built Environment Act (NBEA) 2023, future matters for consideration.** Greater Wellington acknowledges your intent to repeal the NBEA and introduce a fast-track consenting regime. While the NBEA concerned us on several fronts, it proposed useful changes to consenting, compliance, and enforcement, providing a wider range of compliance and enforcement options for councils. It also addressed some problems with the current system.

Any replacement needs to keep the intent of existing provisions that 'the Crown must uphold the integrity, intent, and effect of Treaty settlements, the NHNP Act, and other arrangements in accordance with this clause'.

We ask that any replacement legislation brings forward these changes, which give councils the teeth to achieve the outcomes. We also ask that Government work with the sector to ensure any changes are well connected, the implications well understood, and that implementation is as streamlined as possible.

Lastly, please do not make a meal of any further reforms. We have been dragged through several reform processes in recent years. Each brings with it a diversion from our primary role as environmental protection agency, it costs our ratepayers and most importantly it costs our environment.

Please find attached further information (**Appendix – Further Information**) regarding our partnership with Government and our proposals for your consideration.



We would be pleased to meet with you to discuss Greater Wellington's ongoing partnership with Government and how we may work effectively with you and others for the benefit of New Zealand's environment.

Ngā mihi

A handwritten signature in blue ink that reads "Daran Ponter".

Daran Ponter

Chair

CC: Leaders and Deputy Leaders of Government Coalition Partners, Wellington Constituency Members of Parliament, Wellington Region Mayors, Wellington Region Mana Whenua Iwi Chairs, Local Government New Zealand