



# **SUBMISSION: OUR WATER FUTURE 2019**

**15 APRIL 2019**

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## Submission to 'Our Water Future'

### **Introduction**

Business North Harbour is a significant commercial and industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 35,000 Auckland residents and ratepayers.

Business North Harbour is located within the Upper Harbour Local Board area, which is expected to be the fastest growing area in the country over the next ten years, in both absolute and percentage population terms<sup>1</sup>, which brings both challenges and opportunities to the North Harbour Business district.

Auckland Council is seeking feedback on '*Our Water Future*', a water strategy that looks across the full range of water issues in the region, in order to prepare the Council for decisions about how to manage water. The Consultation Document asks for feedback on the proposed framework for the Water Strategy (including the vision, values, big issues, principles and processes).

Due to the potential impact of the strategy on business, we ask that the BIDs are identified as key stakeholders for the engagement process of the strategy.

Our feedback is set out below.

### **Background - Context**

As indicated in the AKBIDs submission; while BIDs represent most businesses in Auckland, we are also important stakeholders in that we represent and work with a wide range of businesses and Council Controlled Organisations.

Business North Harbours' businesses comprise of a mix of sole traders, Small Medium Enterprises (SME), through to multinational organisations. Our businesses range across manufacturing, warehousing, logistics, services and retail and hospitality, who all use water and are affected by Auckland Council's management of water, but in different ways. In addition, we have key educational institutions within or on our boundary, including Massey University Albany and AUT Millennium, and a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand. All are located within an industrial estate which is on average less than 20 years old.

It is a main priority for the BIDs to improve the environment and amenity of our commercial districts to attract and retain business.

## **Vision**

While we note the advantages of the brevity of your Vision Statement, we are asking for clarification that the protection and enhancement of the life supporting capacity of water also includes its use for economic purposes.

In the Auckland Unitary Plan, the objectives indicate the use of water for economic purposes.<sup>2</sup> We wish to ensure the Vision Statement for 'Our Water Future' captures the use of water for economic purposes.

## **Values**

As mentioned in the AKBIDs submission, your Consultation Document notes that a value-based approach can help connect our decisions back to what we think matters most. In this way, you say that values act as navigational aids, helping Auckland to stay on course towards the vision. Your Consultation Document suggests five values and asks whether these values match what we value about water and to give feedback if there is anything else we value about water.

Business North Harbour recommends including a separate Value to ensure that the businesses are covered and agree with AKBIDs suggested Value "Economy: that water supports and enhances Auckland's commercial success, both now and for the future." This would ensure the Values capture the use of water for economic purposes, as indicated in the Auckland Unitary Plan<sup>2</sup>

Business North Harbour believes education should be paramount in enforcing the Values, with more water sensitive development practices, including a reduction in water usage and polluting, within both the residential and commercial areas.

Business North Harbour agree with the AKBIDs submission that we acknowledge certain land-based activities are degrading freshwater ecosystems, estuaries, harbours and marine waters. In this regard, we note that the Unitary Plan requires minimisation of the loss of sediment from subdivision, use and development.<sup>2</sup>

We also agree with implementation of more water sensitive development practices, the use of rain gardens, litter traps and swales to filter out contaminants from urban stormwater and 'daylighting' streams.

The Auckland BIDs have been supportive of Council's Pollution Prevention Programmes.

Business North Harbour confirm our agreement with following comments included in the AKBIDs submission:

1. We also acknowledge the concerns that many other contaminants accumulate from diffuse sources that are difficult to manage, like the heavy metals that come from car brake linings. Here we note that the Unitary Plan requires measures to reduce contaminants, particularly from high contaminant-generating car parks and high-use roads.<sup>3</sup> We also agree with implementing different treatment systems in the road corridor to treat runoff before it reaches our harbours.
2. We are also concerned that continued population growth and urbanisation will add to the pressures on our waterways, especially by increasing the number of impervious surfaces (hard surfaces like buildings and roads that stop water from soaking into the ground). We agree with careful design to minimise this, but also

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<sup>2</sup> See Unitary Plan, Chapter B7, Coastal water, freshwater and geothermal water, B7.4.2.

ask that the residential sector appropriately make its contribution alongside the commercial sector to addressing this.

3. We note that about one quarter of Auckland's reticulated water supply is used by the commercial sector, with some industries being particularly water intensive, including beverages, food and other manufacturing activities. Here we believe 'water use' for commercial or businesses purposes should be recognized as a Value in the strategy. We are also pleased to have safe, reliable and cost-effective drinking water in Auckland.
4. We agree that Auckland - Tāmaki Makaurau is vulnerable to a range of hazards that pose a risk to our safety and property, such as intense storm events and localised floods. We note that of the 137,000 buildings in Auckland prone to flooding, many will be industrial and commercial buildings. Here again, the Unitary Plan provides guidance by requiring that the risks from natural hazards are not increased in existing developed areas and avoided in new developments. In addition, the functions of natural systems, including floodplains, should be protected from inappropriate development and overland flow paths should be maintained.<sup>2</sup>

### **Big Issues**

Business North Harbour agrees the process of improving the Auckland waters comes at a cost. We believe a priority should be placed on identifying revenue sources to pay for the infrastructure that would equally share the burden of the cost of cleaner waters, instead of relying on rates or targeted rates.

Business North Harbour believes better future town planning should be implemented, prior to growth. Council needs to anticipate the changes and ensure that adaption is progressed.

We agree that when redevelopment or streetscape upgrades occur within the area would be a good time to address some of the existing water problems.

Business North Harbour is concerned that Auckland does not have large freshwater resources, with only 38% of water being sourced from within the region, making Watercare reliant on only a few dams and aquifers. Business North Harbour believes there needs to be a national approach to the solution. We believe a priority must be placed on ensuring adequate new water supply is provided to accommodate population and business growth beyond 2050.

We believe that education of the New Zealand people should commence teaching better and more efficient water use (demand management, especially in the residential sector), rainwater collection and storage, wastewater re-use for non-potable (e.g. industrial) and perhaps potable purposes and looking for other water sources.

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<sup>2</sup> See Unitary Plan, Chapter B10, Environmental risk.

## **Principles and Processes**

Business North Harbour believe 'Our Water Future' should be reviewed to align with the objectives and policies of the Unitary Plan. We also encourage increased communication with the academic researchers and water groups to ensure all matters are covered.

We welcome a collaboration with Council to create a better understanding of our business and property owners needs, therefore supporting Councils decisions and leadership in water management. Balancing the community's ability to pay for the investments that need to be made along with community expectations is a priority for us.

We agree with AKBIDs that we "accept that even with the best techniques, we can't avoid all water impacts from land-based activities. This means that we need practical ways to balance our choices so that, overall, our waterways end up better off than they started. We agree with consideration being given to methods to allow for decision-making at a catchment scale (such as offset mitigation, environmental compensation schemes, and allocation and trading schemes)."

## **Further Feedback**

Business North Harbour agree with the Auckland University recommendation of 're-ordering of priorities – Rather than focusing on the clean-up of contamination of water – look to stopping or at least reducing ongoing contamination of waters by decontaminating storm water – not at discharge but at source.'

We recommend that the Day Zero Clock is started immediately, and the public made aware through a campaign.

Business North Harbour agree that the New Zealand water ownership must remain in public ownership.

We encourage an increase in financial outlay for misconduct.

Business North Harbour believes more emphasis needs to be on what processes will be used to support quality decisions, especially when values conflict.

We agree with AKBIDs request that 'Our Water Future' come with an appropriate monitoring programme and implementation plan to provide certainty, especially as to the costs expected over time.

Also, when considering degradation of water, we ask that the Strategy be clear about the largest causes of degradation and where the greatest gains can be made. Too often we see the focus of regulation and compliance fall on the easiest sector to regulate rather than those sources that are contributing the most to degradation.

We also ask that a clear outline of how all the existing Council policies and documents on water usage will work together to enable a successful implementation of the strategy.

**Thank you**