

AKBIDS

BUSINESS IMPROVEMENT DISTRICTS OF AUCKLAND

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Auckland Council
Private Bag 92300
Auckland 1142

akhaveyoursay@aucklandcouncil.govt.nz

Submission to 'Our Water Future'

Introduction

AKBIDS – the Business Improvement Districts of Auckland - is a collective of BIDs that come together to give feedback when required as 'one voice' at an Auckland regional level.

There are currently 48 BIDs in Auckland, representing over 25,000 businesses with a combined capital value estimated at \$24 billion. Through the BID programme, Auckland's BIDs work with the Auckland Council to improve the local business environment and grow the regional economy.

Auckland Council is seeking feedback on '*Our Water Future*', a water strategy that looks across the full range of water issues in the region, so that Council is prepared when it needs to make decisions about how to manage water. Your 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

By way of background or context, while BIDs represent most businesses in Auckland, we are also important stakeholders in that we represent and work with a wide range of businesses, from those in industrial and commercial zones, to the central city, town centres and smaller retail areas. In some cases, individual BID geographic districts cover several of these zones and areas.

As a consequence, BIDs represent and work with businesses across manufacturing, warehousing, logistics, services, retail and hospitality, who all use water and are affected by Auckland Council's management of water, but in different ways.

Each BID has as objectives to improve the environment and amenity of our commercial districts so as to attract and retain business.

Vision

Your Consultation Document asks for feedback on what kind of water future we want for Auckland-Tāmaki Makaurau? You note that a vision statement helps us to define our destination and guide our choices along the way. Your Consultation Document suggests the following Vision:

Te mauri o te wai o Tāmaki Makaurau – the life supporting capacity of Auckland’s waters – is protected and enhanced.

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

Values

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:

- *Ecosystems: healthy water systems nourish the natural environment.*
- *Water use: we can meet our everyday water needs safely, reliably and efficiently.*
- *Recreation and amenity: we enjoy being in, on and near the water.*
- *Culture: water contributes to our identities and beliefs, as individuals and as part of communities.*
- *Resilience: our communities, catchments and coastlines are resilient to natural hazards and the impacts of climate change.*

Again, we suggest turning to the Unitary Plan, where the objectives there also speak of the use of water for economic purposes.¹ Again, we wish to ensure the Values capture the use of water for economic purposes, perhaps by including a separate Value or explicitly mentioning economic value for water in the value concerning water use. Should a separate value be considered more appropriate, we suggest: “Economy: that water supports and enhances Auckland’s commercial success, both now and for the future.”

We acknowledge the concerns that sediment from land-based activities is degrading freshwater ecosystems as well as 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.² 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. We have been supportive of Council’s Pollution Prevention Programmes and wish to ensure every business complies with the regulations to avoid illegal discharges. Over time we must reduce our reliance on combined wastewater/stormwater systems.

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

¹ See Unitary Plan, Chapter B7, Coastal water, freshwater and geothermal water, B7.4.1.

² See Unitary Plan, Chapter B7, Coastal water, freshwater and geothermal water, B7.4.2.

contaminant-generating car parks and high-use roads.³ We also agree with implementing different treatment systems in the road corridor to treat runoff before it reaches our harbours.

We are also concerned that continued population growth and urbanisation will add to the pressures on our waterways, especially by increasing the amount 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 ask that the residential sector appropriately make its contribution alongside the commercial sector to addressing this. We believe that education is required in both the commercial and residential sector.

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 recognised as a value in the strategy. We are also pleased to have safe, reliable and cost effective drinking water in Auckland.

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.⁴ In this regard, we also welcome Watercare's recent Climate Change Strategy in terms of adaptation to change.

Big Issues

Your Consultation Document notes four 'big issues' that you believe are at the heart of our water future:

- *cleaning up our waters;*
- *growth in the right places;*
- *meeting future water needs; and*
- *adapting to a changing water future.*

Your Consultation Document asks for feedback on how concerned we are about the 'big issues' and what we can do now to anticipate and adapt to the changes in our water future.

While we agree that Aucklanders want cleaner waters, inevitably this comes with a cost. With regard to the recent targeted rate to increase funding of water infrastructure and speed up delivery of cleaner harbours, beaches and streams, we have been supportive of transparently 'ring fencing' spending on this kind of infrastructure (as long as it is spent efficiently and transparently), but we have not accepted that a business differential (even at 25.8%) should be applied to this type of targeted rate. We have accepted that business should pay a share, but not a differential. Here we believe a priority should be placed on identifying revenue sources to pay for this infrastructure that more equitably share the burden of the costs of cleaner waters across the community instead of relying on rates and targeted rates

In terms of growth being in the right places, we agree that when redevelopment or streetscape upgrades occur in our town centres, this is a good time to address some of our existing water problems, such as reducing flood hazards and improving stormwater capture and treatment. Such an approach also helps manage infrastructure investments, concentrating demand in a smaller area and aligning with a compact urban form or transport strategies. Many BIDs would welcome more involvement in these opportunities, especially in regard to maximising a transport investment and corresponding inclusion of a 'clean water strategy'.

³ See Unitary Plan, Chapter E1, Water quality and integrated management.

⁴ See Unitary Plan, Chapter B10, Environmental risk.

Of some concern to us is that Auckland does not have large freshwater resources, with Watercare reliant on only a few dams and aquifers, with the future supply from the Waikato River limited by other allocations. We believe a priority must be placed on ensuring adequate new water supply is provided to accommodate population and business growth beyond 2050. We agree that the solution must be a mixture of 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 (both in the Auckland region and from outside the Auckland region). In this regard, perhaps there are opportunities for incentives for installing rainwater tanks or using grey water.

With regard to adapting to a changing water future, we note that much of the infrastructure most vulnerable to sea level rise is of vital economic importance, such as the Ports of Auckland, Auckland International Airport, the Mangere Sewage Treatment Plant and major motorways/railway lines. Some low-lying industrial/commercial areas, such as those in Onehunga, Otahuhu and South Harbour on the Mangere Inlet are also vulnerable. We agree that we need to anticipate the changes and ensure adaptation is progressed equitably. In this regard, Watercare's Climate Change Strategy is welcomed along with its implementation.

Principles and Processes

Your Consultation Document proposes six principles that you believe are needed to guide your work:

- *Recognise that water is a treasured taonga*
- *Work with ecosystems*
- *Deliver catchment scale thinking and action*
- *Focus on achieving right-sized solutions with multiple benefits*
- *Work together to plan and deliver better water outcomes, and*
- *Look to the future*

You also note that these principles broadly align with the Urban Water Principles of the Urban Water Working Group.⁵ We agree that alignment should be reviewed once there is a final version, but at this point note that the Urban Water Principles are more comprehensive and precise. We also believe 'Our Water Future' should be reviewed to align with the objectives and policies of the Unitary Plan.

We also support Council working directly with industry and other sector groups to support their leadership in water management. Balancing the business community's ability to pay for the investments that need to be made along with community expectations is a priority for us. We also welcome closer collaboration between Council and academic researchers (e.g. at the Universities) over long term scientific research of water quality and the causes of degradation in the Auckland region.

We also 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

While we agree, overall, that Auckland Council should develop a water strategy, we believe more emphasis needs to be placed on the processes which will be used to support quality decisions, especially when values conflict.

⁵ <http://www.mfe.govt.nz/sites/default/files/media/Fresh%20water/Phase-1-Report-Urban-Water-Working-Group-Urban-Water-Principles-final.pdf>

For example, in any decision regarding water, how should decision-makers prioritise one value over another if they are in conflict (such as cost and environmental outcomes)? Is 'water use' for commercial or businesses purposes to be prioritised over other uses, such as recreational use or amenity? We believe these mechanisms must be a focus of the 'Our Water Future' document.

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 suggest consideration be given to re-ordering priorities. For example, should priority be given to decontaminating stormwater at source rather than at the point of discharge?

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

Finally, we are concerned about the number of regulatory and non-regulatory strategies, plans and policies there are that relate to water and while we note that the aspiration of 'Our Water Future' is to provide an overarching way forward, we ask that 'Our Water Future' captures the essence of these other documents (especially those that are regulatory in nature), and ask for a clear outline of how these policies will work together to enable a successful implementation of the Strategy.