

4 April 2024

Office of Hon Chris Bishop  
Minister Responsible for RMA Reform  
Wellington  
Via email [christopher.bishop@parliament.govt.nz](mailto:christopher.bishop@parliament.govt.nz)

Tēnā koutou katoa

### **Inviting views on targeted changes to the Resource Management Act 1991 (RMA)**

Water New Zealand (Water NZ) welcomes the opportunity to help inform the Government's policy development of a second bill of targeted changes to the RMA.

Water NZ is a national not-for-profit organisation which promotes the sustainable management and development of New Zealand's three waters (drinking water, wastewater and stormwater). Water NZ is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Its ~3,200 members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants, suppliers, government agencies, academia and scientists.

While we are grateful for the opportunity to have input into the drafting of the second amendment bill, our ability to provide comprehensive suggestions is limited by the timeframe for input.

Also, noting our members' interests, our input focuses on the water environment and infrastructure aspects of any potential changes to the RMA legislation.

### **The water environment is vulnerable**

Access to safe water, sanitation and hygiene is the most basic human need for health and well-being.

Many freshwater waterbodies across Aotearoa New Zealand, are degraded and have been for some time. 47% of wastewater treatment plants discharge to freshwater. Many wastewater treatment plants are currently near full operational capacity. During wet weather events, or

failures in a network, sewer overflows can occur, resulting potential environmental or human health harm. This highlights the link between water service delivery and freshwater.

Without significant investment, the water environment will worsen due to neglect, aging assets, increasing growth, public expectations of higher levels of service, and the challenges of climate change adaptation and mitigation.

### **Investment in water is needed to support growth and development**

The government wants to make it easier to build houses, grow business and the primary sector and deliver high quality infrastructure. Currently the availability, capacity and performance of many drinking water and wastewater treatment plants and associated networks do not have ability to support the potential greenfield expansion, urban infill or industrial growth.

Local Water Done Well must unlock funding and financing to enable the necessary investment in water. Further, strategies for accelerating investment programmes, procurement, and payment processes are necessary to greatly reduce the time between project approvals and completion.

### **Avoid new development, and supporting infrastructure, in high-risk areas**

The 2019 National Climate Change Risk Assessment identified potable water supplies as the number one of the top 10 priority risks (availability and quality) due to changes in rainfall, temperature, drought, extreme weather events and ongoing sea-level rise. The risk to wastewater and stormwater systems (and levels of service) due to extreme weather events and ongoing sea-level rise was also within the NCCRA top 10 priorities.

Floods are New Zealand's most frequent and most significant natural hazard. Treasury has estimated the cost of asset damage alone from Auckland's flood and Cyclone Gabrielle at between \$9 billion and \$14.5 billion alone. Far exceeding previous amounts at \$170 million per year.

Climate change is increasing frequency and intensity of storm events. Along with growth and intensification of our urban environment, all increase the risk of flooding. Recent flooding and storm events have illustrated this increasing risk and an unambiguous need for change.

The policy framework must enable the efficiency of use between water takes and discharge (water leaks and unaccounted for water can increase the water take) otherwise towns and cities may risk repeated water shortages. An enabling framework for allocating freshwater that incentivises efficient water use and conservation within a catchment would be appropriate.

Human drinking water, sources, protection, allocation and efficient use need consideration though any RMA process. We support work that addresses over-allocation.

### **The integration of land use planning and capital investment planning**

In Water NZ's view, a requirement for integrated planning of public infrastructure provision and land development would provide sequence and certainty to network infrastructure construction and funding.

Further, we consider integrated spatial planning, at a catchment level, should specifically identify areas with infrastructure constraints to provide guidance about areas where any development or significant change in use needs to be avoided or carefully managed because of infrastructure and natural resource limitations.

### **There is a bow wave coming of consenting of wastewater treatment plants**

Under the Water Services Act 2021, Taumata Arowai is required to develop wastewater standards and targets. The intent is that this will enable greater consistency in treatment plant design, performance and capacity across the country. It would also reduce the regulatory burden, providing certainty and efficiencies, for designers, technology providers and service providers. Regional councils will remain responsible for regulation, consenting, compliance and enforcement of these standards.

Any policy must, of course, pragmatically and prudently balance the protection of the water environment, affordability, achievability, while at the same time not imposing unreasonable barriers to development.

Consistent [re]consenting processes are integral for the continuous and progressive improvement of water quality in New Zealand.

### **Conclusion**

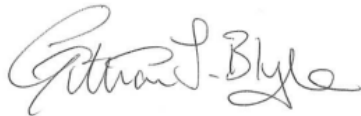
Growth and a healthy environment are not mutually exclusive. However, the two do pose complex resource and land use planning challenges. Ensuring that environmental values are met, and infrastructure and housing provision continues in an efficient, effective and sustainable way is paramount.

Water NZ suggests that a more holistic approach is taken, across all reforms and other programmes, to broader infrastructure planning and regulatory frameworks to ensure consistency, efficiency and ultimately good environmental and economic outcomes while ensuring communities have safe delivery of essential services.

Water NZ thanks the Minister for the opportunity to provide comments and suggestions to inform the drafting of future Resource Management legislation. We look forward to continuing to work with the Government to refine and contribute to resource management reform policy, regulation, and delivery.

If you have any queries in relation to this letter please contact [Nicci.Wood@waternz.org.nz](mailto:Nicci.Wood@waternz.org.nz)

Ngā mihi nui



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