

Summary of key submission themes and officer comments

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1. Issues within scope

1.1 The proposed rates increase for 2016/17

1.1.1 Summary of key submission themes

Submission numbers 1, 2, 3, 4, 5, 6, 7, 8, 12, 15, 16, 21, 22, 26, 27, 33, 43, 47, 49, 50, 52, 53, 54, 56, 58, 59, 60, 61

Eight submitters expressed support for the rates increase. Of those who opposed the rates increase concerns were raised regarding affordability in general and the following points were made:

- With the current low inflation it seems unreasonable to increase rates
- Suggestions were made for GWRC to reprioritise spending across the council and to look for cost savings.

1.1.2 Officer comments

The rates increase is mostly being driven by the increase in debt over the 2015/16 and 2016/17 years. Most of the increase occurred in the current 2015/16 year, primarily driven by the purchase of new trains. The \$11m increase in debt for 2016/17 is made up of the remaining cost for the trains and flood protection work for the Hutt City Centre. There is a significant amount (\$5m) for the Hutt City Centre project required in the 16/17 financial year. All these items are prior commitments as agreed in the 10 Year Plan 2015-25 (LTP).

We were projecting a 10.8% rates increase in our LTP. However, following a review of our activities and taking into account all changes, we are proposing a lower rates increase of 7.9%. This reduction is driven by cost containment, timing on projects, and lower interest rates.

There is continued investment in key areas:

- Public transport
- Flood protection, water resilience
- Environmental outcomes including water quality

Public Transport costs are driven by investment in improved infrastructure, patronage and in particular costs related to the Public Transport Operating Model (PTOM):

- Matangi trains
- Rail network charges
- Rail maintenance
- Integrated ticketing
- Bus Rapid Transport
- PTOM Transition

Flood protection costs are driven by several major capital programmes:

- Hutt City Centre
- Waiohine
- Te Kauru

- Floodplain Management Plan investigation capex

Environment / water quality are driven mostly by increased levels of activity:

- Expanded possum and predator programme
- Expansion of farm environment plans
- Wetland/riparian management programme
- Natural Resources Plan hearings, collaborative modelling and accelerated Whaitua process

Regarding various rate increases across regions; this is primarily due to relative movements in property values by region, upon which general rates are based.

Regarding WREDA, this is co-funded by WCC and GWRC. There is no double up in ratings. GWRC funds the 'Grow Wellington' component of WREDA and WCC funds the remaining functions.

Regarding 'Operating Revenue', the increase is primarily due to the structure of the new rail contract whereby GW will now directly receive fare revenue (Approximately \$47 million), rather than it being recognised by the operator. Previously grant revenue covered only the net costs (i.e. fare revenue received by operator less costs) but now cover full operating costs. The net effect is the same. Effectively there is no significant increase in grants and subsidies.

1.2 Regional Leadership

1.2.1 Additional Activities – GWRC vehicle fleet

1.2.1.1 Summary of key submission themes

Submission numbers 8, 11, 12, 21, 25, 29, 37, 38, 44, 47, 48, 50, 51, 54, 58, 59

Submitters were overall supportive of the introduction of an electric car fleet for GWRC. There were suggestions to apply a wider lens to electric vehicles than just GWRC. There were also a few suggestions provided regarding the charging stations, e.g. to have coffee stations alongside, and allowing for other forms of electric transport as well, i.e. bikes, scooters.

Submitters also requested that GWRC work alongside other local councils, especially Wellington City Council.

1.2.1.2 Officer comments

Support for electric vehicles is noted. GWRC will progressively introduce electric vehicles into its vehicle fleet. GWRC is working collaboratively with WCC, other TAs, Government and private sector organisations to facilitate a network of charging stations across the region as well as other initiatives to accelerate the uptake of electric vehicles.

1.2.2 Activity Delays – Wellington Region Spatial Plan

1.2.2.1 Summary of key submission themes

Submission numbers 47

OraTaiao: NZ Climate and Health Council was the only submitter noting that the delay “appears to create savings, these may be offset by greater costs – such as a delayed Regional Wellington Spatial Plan that results in increased travel costs and more new infrastructure exposed to flooding and sea level rises”.

1.2.2.2 Officer comments

The Local Government Commission has a work stream looking at spatial planning in the Wellington Region and the value this might add. It is prudent to await the outcome of the Local Government Commission investigation before determining how to proceed.

1.3 Public Transport

1.3.1 Activity Delays – Electronic integrated fares and ticketing

1.3.1.1 Summary of key submission themes

Submission numbers 6, 7, 8, 15, 25, 26, 27, 29, 31, 36, 37, 38, 41, 43, 44, 47, 48, 49, 50, 51, 54, 55

Submitters expressed disappointment in the delay but overall were in support for an integrated ticketing system and also that the implemented solution is a fully regional and or national integrated system and that it be an ongoing viable solution.

UHCC specifically requested more clarity be provided at decision time.

Two submitters made reference for GWRC to aspire to international standards.

1.3.1.2 Officer comments

The delay to the introduction of an integrated ticketing system has arisen by the rapidly changing technology options that are emerging together with the need to ensure that the system employed provides the best value for money from both a Wellington region and a national perspective.

GWRC is working closely with the NZ Transport Agency, NZ Transport Ticketing Limited, other regional councils and Auckland Transport to outline the pathway forward for all parties. It is expected that the pathway will be defined by mid-2016.

1.3.2 Additional Activities – Ngauranga to Airport (N2A)

1.3.2.1 Summary of key submission themes

Submission numbers 3, 6, 8, 12, 15, 22, 25, 26, 27, 29, 31, 36, 37, 38, 41, 43, 44, 47, 48, 49, 50, 51, 54, 55

Submitters expressed their general support for ongoing improvement to public transport while some submitters expressed a concern over the delay and a few expressly supporting a move towards a

fully electric fleet. However, a number of questions have been asked regarding looking into other options, specifically the Light Rail Transit (LRT) option was raised by several respondents.

Mt Victoria Residents' Association raised several concerns regarding the routes and encouraging ways to look at reducing the amount of traffic and parking in the city.

1.3.2.2 Officer comments

The N2A programme (Let's Get Wellington Moving) is re-looking at the transport issues in central Wellington and will assess a wide range of options to deliver improved transport and urban outcomes. Rapid bus is an agreed approach but will be re-tested as part of this programme through the development of a Detailed Business Case and through the integrated planning and assessment process, including the development of a new integrated transport model.

1.3.3 Cost Changes – Wellington City bus network

1.3.3.1 Summary of key submission themes

Submission numbers 4, 5, 6, 8, 20, 22, 25, 29, 35, 36, 37, 38, 40, 41, 47, 48, 51, 53, 54, 55, 56, 57, 59

Submitters were in general supportive of investing in the Wellington City bus network. Several of the submitters, noted that this might best be served by retaining the trolley buses.

One submitter questioned the information decisions are based on and requests a review be undertaken of the trolley buses.

1.3.3.2 Officer comments

It is pleasing to see the support for investing in the Wellington City bus network. The decision to not renew the trolley bus contract has been well debated and took into account the state of the assets involved (buses, overhead network, power supply), the ability of trolley buses to meet the requirements of the new network (which is designed to grow patronage), health and environmental factors, bus technologies and the investment required. The real gains in emission reduction will be made from getting more people onto public transport.

1.4 Water Supply

1.4.1 Activity delays – Waterloo bores

Additional Activities – Wellington water resilience

1.4.1.1 Summary of key submission themes

Submission numbers 15, 23, 49

Two submitters were supportive. One submitted provided alternative ideas to be looked at in terms of encouraging water conservation.

1.4.1.2 Officer comments

Water conservation is seen as an essential part of responsible use of our water resources. There is a commitment for ongoing investment in community education to influence people's water use behaviours. There is also ongoing investment in network management to minimise water wastage.

Water meters are a way of influencing water use behaviour. Kapiti Coast District Council (KCDC) recently implemented universal water metering and achieved a reduction in per capita consumption. However, the per capita consumption in the Wellington metropolitan region without water meters remains significantly below that of KCDC. Previous work indicates that the cost of implementing a meter installation programme would be in the order of \$70 million plus ongoing maintenance costs. Water metering could be considered as an option in the future as the water supply system approaches capacity and options for deferring the significant cost of developing a new source are considered.

Since 2006 there has been a steady decline in both gross and per capita consumption which has deferred the need for a new water source to beyond 2035. The planned renewals in the Waterloo wellfield will replace aging assets rather than increase capacity beyond current consented limits.

1.5 Environment

1.5.1 Cost changes – Collaborative Modelling Project

1.5.1.1 Summary of key submission themes

Submission numbers 4, 27, 33, 43

Submitters were generally supportive of the project but clarification was requested regarding project costings.

1.5.1.2 Officer comments

The costs for the collaborative modelling project to date have been around the magnitude expected for a project of this size and complexity. The current council funding for the project for this and subsequent years relied on securing sufficient long-term funding from other agencies. While the council secured funding and in-kind support from the Ministry for the Environment and Ministry for Primary Industries, these were short-term funding and when combined with Council funding, insufficient to cover the forecast expenditure in this and subsequent years.

GWRC continues to seek opportunities to secure financial or in-kind support from other agencies. However, the funding changes proposed in the annual plan are required to ensure that Whaitua Committees are supported by fit-for-purpose and robust modelling information. GW is committed to transparent process and the reports and documentation will be shared and made available on line as they become available. The Whaitua committee will engage with stakeholders and communities and share the information as it becomes available.

1.5.2 Cost changes – Natural Resources Plan (NRP)

1.5.2.1 Summary of key submission themes

Submission numbers 4, 5, 8, 15, 59

Submitters were generally supportive for the NRP with a couple of queries, being:

- a wish to understand the project costs and in particular how much independent commissioners will be receiving

- that consideration be given to transport issues in the NRP, weakening water quality standards and continued privatisation of the inner city waterfront.

1.5.2.2 Officer comments

The cost of the proposed NRP is consistent with investment made across the country for planning work of a similar scale. Council is bringing together five operative plans into a more streamlined, coherent and integrated planning approach, with the aim of providing long term benefits for plan users and the community as a whole. The complexity of this initial step to bringing the plans together warrants use of independent commissioners to hear the proposed NRP to ensure the fullest consideration possible of the wide range of important matters it covers.

The independent commissioners were contracted at market rate after significant negotiation, which took into account their skill set, availability and the value for money each offered. The total amount payable to commissioners is an estimate at this point as it will be based on the hours worked, and therefore will depend on the length of the hearing process.

The proposed NRP only considers transport issues in the sense that regionally significant transport infrastructure set out in the RPS is provided for in the proposed NRP and the environmental effects on water and air of transport activities are managed under the plan as far as is possible under the RMA. We note that Wellington Waterfront is not in the jurisdiction of GWRC

1.5.3 Additional activities – Ruamahanga planting

1.5.3.1 Summary of key submission themes

Submission numbers 8, 15

Of the two submitters, one supported and one opposed the Ruamahanga planting. One in particular opposed the use of willow trees.

1.5.3.2 Officer comments

Willow varieties that are planted in the Ruamahanga catchment are sourced from our Akura Conservation Centre nursery near Masterton. These varieties have been developed in conjunction with the NZ Poplar and Willow Trust and are selected specifically to negate spread by fragmentation. The older Crack and Grey willows which are mostly to blame for river channel blockages are steadily being removed from the catchment.

1.5.4 Cost changes – Wairarapa Water Use Project

1.5.4.1 Summary of key submission themes

Submission numbers 4, 8, 33

One submitter expressed support for this project, one submitter opposed citing the active fault line, and one submitter requested clarification as to whether the project timelines were realistic.

1.5.4.2 Officer comments

With regard to fault lines, the design criteria and standards for investigation and design of the proposed dams are based on the highest Potential Impact Classification (PIC) of a dam. This is in line with legislation, NZ industry guidelines and international practice. Investigations are relatively early

stage and will continue through a number of future phases of the project. Project timelines will be regularly assessed and recalibrated based on the findings of investigations.

1.5.5 Activity delays – Wairarapa Water Use Project

1.5.5.1 Summary of key submission themes

Submission numbers 8, 40, 60

Submitters questioned the need for the project.

1.5.5.2 Officer comments

Wairarapa Water (previously Wairarapa Water Use Project) offers many opportunities for the community including a potential significant increase to regional GDP and jobs, urban water supply, stock water race supplementation and environmental improvements in lakes and rivers. The project will assess the environmental risks and opportunities by working closely with the Collaborative Modelling Project and Whaitua programme.

1.6 Flood Protection

1.6.1 Activity delays – Floodplain Management Plans

1.6.1.1 Summary of key submission themes

Submission numbers 15, 27, 43, 53, 61

Submitters were supportive of the Floodplain Management Plans as a whole. One submitter expressed disappointment with the delays in the Waiwhetu Floodplain Management Plan. KCDC expressed pleasure with the recent floodplain modelling completed for Kapiti and emphasised the need for ongoing support.

1.6.1.2 Officer comments

GWRC has undertaken steps to ensure we can recommence the work on the Waiwhetu FMP within the 16/17 financial year. The complexity of issues in this catchment are such that it is unlikely that we will complete the work within the 16/17 financial year. The River Ranger will liaise with HCC staff about the completion of the short section of footpath near Norfolk Street. The support from KCDC is noted, and we are working closely with KCDC officers to ensure all service requests are attended to.

2. Issues outside scope of consultation

2.1 Regional Leadership

2.1.1 Emergency Management

2.1.1.1 Summary of key submission themes

Submission numbers 59, 61

Submitters were supportive of the general thrust of the emergency management approach but both submitters ask that the council ensure adequate resources are provided together with strong leadership from the council.

One submitter noted that people should be encouraged to install water catchment systems and also noted the water tank advocated by council allows mosquitoes in.

2.1.1.2 Officer comments

The positive feedback and support is noted. The Wellington Region Emergency Management Office (WREMO) is working through a programme to create Community Response Plans throughout the region. To date approximately 25 of these plans have either been completed or are close to signature. The process sees a broad section of the community sharing their knowledge, building connections and determining how things might best work during an emergency. These plans are then supported by the relevant council, who are a signatory to the document.

WREMO is adequately resourced to deliver on the programme however process is largely dependent on the knowledge and energy from within the community.

We note the support for the project to encourage the installation of rainwater tanks in the region. Your comment is noted. If the council becomes aware of consistent issues with the tanks they will be reviewed and assessed at that time.

2.1.2 Transport Planning

2.1.2.1 Summary of key submission themes

Submission numbers 13, 20, 23, 26, 37, 42, 44, 47, 50, 58, 59, 61

Submitters outlined a number of areas for consideration in the region's future transport planning to reduce congestion and increase the use of other forms of travel, e.g. walking and cycling. These suggestions included:

- Increase CBD carparking costs
- More measures to support the most vulnerable
- Reflection of climate change objectives be included
- Requests to provide options to commuters in Otaki and Levin

2.1.2.2 Officer comments

The Regional Land Transport Plan promotes a balanced strategy. Some improvements to roads are required to provide improved access to and within the region, this is balanced with improvements to

public transport, walking and cycling and a range of Travel Demand Management measures. A programme business case is proposed to examine potential measures in central Wellington including parking management (subject to funding approval and agreement with key partners). GWRC has a programme of behaviour change aimed at increasing take-up of active modes and Public Transport; however, it is not a road controlling authority and does not have a direct role in walking and cycling infrastructure on the road network.

Improving 'liveability' is identified as an important element of the RLTP approach, and means that impacts on the environment, amenity and community wellbeing are all considerations of transport planning under this framework. Improving 'resilience' is another key element, which means considering how we can adapt and respond to future challenges like climate change, seismic events, demographics, and technology and lifestyle changes.

GWRC notes the request to consider options for Otaki and Levin commuters. In particular, the request from Horizons Regional Council to fund a Levin to Waikanae bus service has been considered and discussed with the NZ Transport Agency, who has advised that this is a short term trial project. As a trial, there is no agreement to ongoing funding and evaluation and further decisions will need to be undertaken on the value for money of any service. If NZTA and subsequently GWRC decide that funding the service (after the trial) is appropriate, the relatively small investment required from GWRC for the proposed service is unlikely to require a separate funding allocation.

2.1.3 Additional Activities – funding requests

2.1.3.1 Summary of key submission themes

Submission numbers 42, 45

Two submissions were received requesting specific funding:

1. Sport Wellington requested an annual contribution of \$25,000 to support a Regional Strategy for Sport and Recreation
2. Porirua City Council requested a contribution of \$80,000 for 2016/17 year to assist with co-funding the construction of a Jumping Platform at Paremata.

2.1.3.2 Officer comments

Sport New Zealand has funded Sport Wellington for a period of three years to develop a Regional Strategy for Sport and Recreation and GWRC officers have been involved in the process to develop the Strategy. Proposals for funding to support the Regional Strategy may best be considered when the Strategy is completed and is clear what the funding would be used for.

It is acknowledged that there is a long standing issue with people jumping from the Paremata bridge, and we have worked with PCC over the last few years to try and resolve this issue. To that end we support the proposal to investigate a diving platform. Depending on final design and location for the platform, consideration could be given to making a contribution to its construction. Prior to making any funding commitment we would want to ensure that there is the opportunity to contribute to the further development of the proposal, and would be looking to ensure that funding is also sourced from the New Zealand Transport Agency.

2.1.4 Representation and Leadership

2.1.4.1 Summary of key submission themes

Submission numbers 33, 43, 46, 47, 49, 61

Submitters provided general support for GWRC's role of leadership and collaboration across the region. The following points in particular were made:

- A request for clarification of iwi representation and whether "other" advisory groups will be added, i.e. a farming advisory group, and a request that a copy of the Stocktake of Obligations to Maori report be made public
- A comment to take the lead when necessary on the Kaiwharawhara reclamation project
- Support from the Wellington Chamber of Commerce for structural transformation of local government

2.1.4.2 Officer comments

On some GWRC committees non-councillor members have been appointed on the basis of their skills and experience rather than representing a particular organisation. These members have voting rights (with one exception). Where these members are Maori they have been appointed in line with the provisions of the Local Government Act, section 4, which requires the improvement of opportunities for Maori to contribute to local government decision-making processes.

The Stocktake of Mechanisms for Working with Maori (previously Stocktake of Obligations to Maori) is not yet complete but will be made available to the public once finalised.

The Kaiwharawhara reclamation is a potential project of CentrePort Ltd rather than GWRC. GWRC is involved in a collaborative exercise with NZTA, WCC, CentrePort and the ferry companies to investigate access to the Port area, which includes consideration of the future of this area of land.

GWRC notes that the Local Government Commission is responsible for the process of considering structural transformation of local government.

2.2 Public Transport

2.2.1 Fares

2.2.1.1 Summary of key submission themes

Submission numbers 29, 31, 37, 38, 41, 43, 47, 48, 51, 54, 55

Submitters asked GWRC to consider a reduction in fares, especially the Youth Fare and for seniors.

Reference was made a couple of times to a proposed reduction in fares for 2016/17 outlined in the Regional Public Transport Plan.

2.2.1.2 Officer comments

GWRC's fare policies are set out in the Wellington Region Public Transport Plan 2014 (PT Plan) and the council is working towards progressive introduction of those policies over time.

The approach to student fares received considerable attention throughout the process to develop and adopt the PT Plan. The final PT Plan includes a 25% off-peak discount for all users (including students) on the basis that the fare structure should reward behaviours rather than advantage particular groups within the community. It also signals future policies including bulk purchases of discounted tickets, fare capping and free transfers between services through the Integrated Fares and Ticketing project. Students and the wider community will benefit from these changes, once introduced.

2.2.2 Rail contract

2.2.2.1 Summary of key submission themes

Submission numbers 12, 49

Two submissions were received on this topic, one in support and one in opposition citing previous issues with foreign company ownership.

2.2.2.2 Officer comments

Transdev Wellington Ltd was chosen as the new rail operator following an international tendering process. No local companies bid for the work – the KiwiRail bid was as a minor party in an international consortium. KiwiRail remains as owner and maintainer of the rail network and GWRC retains ownership of the trains making the situation quite different to previous arrangements of foreign ownership of the rail assets.

2.2.3 Park and ride services

2.2.3.1 Summary of key submission themes

Submission numbers 9, 15, 16, 43, 44, 61

There was a mixed response from submitters to park and ride facilities - submitters either identifying additional facilities required; or suggesting some form of user-pays to encourage walking or use of the bus services.

2.2.3.2 Officer comments

The provision of park and ride facilities has a beneficial impact on growing rail patronage. While GWRC continues to provide alternatives such as connecting bus services and bicycle storage, the demand for parking spaces remains high. We continue to invest in additional parking and will be addressing a number of the areas of concern raised by submitters.

2.2.4 Bus services

2.2.4.1 Summary of key submission themes

Submission numbers 20, 25, 27, 30, 32, 37, 44, 54, 59

The submitters all made mention of specific bus services they believe need to be addressed.

In addition one submitter mentioned some generic approaches to be considered:

- let bus go first sign
- pre-paid off peak travel cards

- dogs to travel on buses and trains
- fare concessions to tertiary students

2.2.4.2 Officer comments

GWRC will continue to work with local communities to review and amend the bus network so that it meets the needs of local communities while remaining affordable to all of those who pay – users, ratepayers and taxpayers. Money saved from the reviews is re-invested in the network through the provision of new services or extensions to existing services.

2.2.5 Additional Activities - Other

2.2.5.1 Summary of key submission themes

Submission numbers 21, 36, 59

Submitters commented on the use of diesel buses and the impact this has on the environment, suggesting measures to manage this including moving to a fully electric fleet.

2.2.5.2 Officer comments

GWRC does not believe that there is any fully electric battery bus technology in existence at the current time that is proven as a viable technology for Wellington's geography and network. The introduction of hybrids, therefore, is a sensible intermediate step towards our goal of an all-electric fleet. Overall GWRC's fleet strategy will result in a 33% deduction of tailpipe emissions in Wellington City.

2.3 Environment

2.3.1 Biodiversity

2.3.1.1 Summary of key submission themes

Submission numbers 31, 32, 33, 39, 40, 54

The submitters voiced concerns over various aspects of flora and fauna health, or biodiversity health requesting that GWRC look at suggested options. Including:

- use people instead of sprays in the town belt and city walkways
- develop a shared strategy with the community
- include a performance indicator for the council in reference to biodiversity in parks
- the management of Old Man's Beard

2.3.1.2 Officer comments

People vs sprays

GWRC uses a range of methods to control pest plants in the region including manual removal, biological control and agrichemicals. The method at the specific site is selected based on the nationally accepted best practice for pest plant management. We note that weed/pest control in the Town Belt and City walkways is the responsibility of Wellington City Council.

Community Strategy

We will continue to work with Federated Farmers and community groups to review opportunities to enhance biodiversity in the region. Aligning our Regional Possum Predator Control Programme with other regional programmes (e.g. TbFreeNZ, DoC) is an important initial step. The development of a community strategy may well be required to ensure alignment as future growth of the RPPCP is envisaged.

Performance measure request

Key Native Ecosystem (KNE) sites within Regional Parks have three-year plans with biodiversity objectives. GWRC currently spends \$83,000 on pest plant control within East Harbour Regional Park.

Pest management programme

The strong support for the large investment made by the Council, over many years, in controlling pest animals and pest plants is acknowledged. We do not see it necessary to seek that independent ecological advice be sought on the impact on the genetic composition of the indigenous plant species in the Council's parks and reserves, resulting from planting by staff and community groups.

Old Man's Beard

GWRC conducted a major Old Man's Beard control programme in Wellington City between 1993 and 2002. When the Regional Pest Management Strategy (RPMS) was reviewed in 2002, a random survey of 1000 past controlled Old Man's Beard sites was conducted as a part of the review process. 78% of those sites inspected still hosted Old Man's Beard.

At that time there were already 8000 recorded sites of Old Man's Beard in Wellington and the worst affected areas had yet to be surveyed. It is estimated that there are in excess of 15,000 individual sites of Old Man's Beard in the City.

The review survey found that although the visual impact of the plant had been reduced considerably in the areas worked, the overall programme had not been successful in terms of eradicating Old Man's Beard from the sites already controlled and as such the programme was no longer sustainable nor was the end goal of total eradication achievable.

The Biosecurity Act 1993 requires that plants considered for inclusion into a RMPS be put through a Cost Benefit Analysis (CBA) process. Using the infestation area and control cost data from the previous nine year control programme as well as the data from the review survey, Old Man's Beard no longer met the CBA criteria to be included in the RPMS as a Total Control species.

In the 2002-2022 RPMS Old Man's Beard was downgraded to a site led boundary control species to reflect these facts.

The RPMS boundary control rules provides for the protection of properties from vegetative spread of the plant from an infected property.

GWRC invests in the Landcare Research Biological Control research programme and a number of different Old Man's Beard biological control agents have been released in Wellington.

2.3.2 Whaitua project

2.3.2.1 Summary of key submission themes

Submission numbers 33, 61

There were two submitters who made specific comments.

1. Federated Farmers requested a plan for investment in stakeholder and community engagement and that limits reflect community values;
2. KCDC welcomed the council's support and expressed a desire to set a timeframe for the Kapiti Whaitua.

2.3.2.2 Officer comments

A strong engagement and communication programme is associated with the Whaitua programme involving specific stakeholder meetings, covering values work, the collaborative modelling process and the whaitua process itself. There have been approximately 20 public meeting across the Ruamahanga relating to the Whaitua's work to-date and 5 to 10 more are scheduled for the coming months. The material presented to the Whaitua committee is available on our web site and formal Committee Meetings are public. The Council has and will continue to clearly indicate the requirements under the NPS-FM and that arriving at limits to achieve community values and objectives involves a process of considering various options and the economic, environmental, social and cultural impacts and benefits of these, as far as is possible.

Kapiti Coast District Council's request regarding a time frame for the commencement of the Kapiti Coast Whaitua process is welcomed. The indicative time frame involving the formation of the Whaitua Committee starting early 2018.

2.3.3 Climate change

2.3.3.1 Summary of key submission themes

Submission numbers 58, 36

Submitters requested that GWRC incorporate a process to consider how GWRC activities contribute to climate change.

2.3.3.2 Officer comments

Support for the Climate Change Strategy is noted. One of the future actions arising from the Strategy is to develop a mechanism to ensure reports to Council fully consider any impacts and implications on climate change.

2.3.4 Other

2.3.4.1 Summary of key submission themes

Submission number 33

Various issues were raised by Federated Farmers, including:

- Water quality is not declining and the supporting information should be amended to state this

- Significant improvement in the consents administration process is required
- Suggested more detailed monitoring in priority catchment areas and expressed concern over monitoring charges and the way charges are allocated.

2.3.4.2 Officer comments

In the latest State of the Environment (SoE) report, released in 2012, the majority of analyses did not detect any statistically significant trends showing either improving or deteriorating water quality. We are therefore unable to say that water quality is not declining. Further analysis to look at longer term trend analysis in the Ruamahanga will be undertaken through the Whaitua process.

We agree that it is critical that GWRC continues to provide consistent and clear advice across the region around the way in which we are interpreting and implementing proposed NRP provisions. It is also important that such advice is not developed in isolation. With this in mind, the Environmental Regulation team are working closely with the Environmental Policy Department to ensure we are getting the intent right as we implement new provisions, and that our approach is robust and legally appropriate given the changing status of provisions through the proposed NRP first schedule process.

With respect to guidance around 'ground rules', much is already provided in our operative Regional Plans and the proposed NRP, and we continue to work closely with the wide sector on key provisions, such as around drains and streams rules. We have also extended invitations to the Federated Farmers to work through issues where consistency and clarity of advice has been questioned, particularly around dairy effluent storage, and welcome any further requests to clarify the information provided to date. To that end we are happy to work through any other issues of concern around interpretation of provisions.

GWRC is looking at ways to improve our monitoring for a number of uses, and we use our science staff and external expertise to ensure we can get the most cost effective and fit for purpose monitoring requirements. GWRC's State of Environment monitoring charges were set when we reviewed our Resource Management Charging Policy in 2015. The setting of charges is guided by section 36 of the RMA, and the special consultative procedure set out in the LGA was used. The State of the Environment charges are used to monitor the impact of consents on the environment, and the data we gather can also be used to inform policy development, although it is not gathered for this purpose.

2.3.5 Enviroschools

2.3.5.1 Summary of key submission themes

Submission number 19

One submitter acknowledged the support provided by GWRC and encouraged this to continue.

2.3.5.2 Officer comments

GWRC intends to continue supporting Enviroschools, including funding and providing facilities at our offices. GWRC values the contribution that Enviroschools makes towards educating our youth regarding our environment.

2.3.6 Fluoride

2.3.6.1 Summary of key submission themes

Submission numbers 14, 17, 18, 28, 34, 63-179

Five submitters provided extensive commentary and references to support their opposition of the fluoridation of water, citing several health concerns caused through this process. In addition, 117 pro-forma submissions were received on the issue.

2.3.6.2 Officer comments

The natural level of fluoride in Wellington's water is around 0.1 milligrams per litre or parts per million (ppm). The Ministry of Health recommends that water suppliers should adjust the amount of fluoride in drinking water to between 0.7 and 1.0 ppm, as this is considered the optimal level for good dental health. Our policy is to adjust the fluoride content of the water we supply in line with the Ministry's recommendation. Our customers, the region's four city councils, support this policy.

There has been much debate about the merits of adding fluoride to water supplies. The current advice and information that we have from the Ministry of Health is that there are no significant health concerns associated with water fluoridation at the optimal level for dental health: 0.7 to 1.0ppm.

2.4 Flood Protection

2.4.1 Additional activities - other

2.4.1.1 Summary of key submission themes

Submission numbers 10, 33, 62

Three specific requests to GWRC were made:

- Friends of the Otaki River requested that the additional support provided by GWRC continue
- Te Marua Golf Club requested assistance to reduce riverbank erosion
- Federated Farmers requested clarification on the riparian/wetland partnership package for Category One waterbodies.

2.4.1.2 Officer comments

Friends of the Otaki River

Council currently contributes \$50,000 to support Waikanae and Otaki River environmental enhancement work. In the last year we were able to fund a further \$13,000 towards this work because the relatively mild weather meant other flood repair budgets had not been fully utilised. The Friends of the Otaki River are seeking to make this additional contribution permanent. At this stage, floods from last year have meant that we do not have unspent flood repair budget and we are therefore unable to confirm at this stage whether we would be able to contribute the extra \$13,000 for all future years from within the budget. From a Flood Protection Department perspective the enhancement work of the Friends of the Otaki River is providing a very positive contribution to the management of the River environment.

Te Marua Golf Club

GWRC has made previous contributions to work on the reach of the Hutt River that flows through the Te Marua Golf Course from within the isolated works funding budget. Representatives from the Club have made presentations to Officers on further erosion protection work considered essential to ensure the ongoing viability of the club. The grounds for such a contribution to further erosion protection works are much the same as for the previous works and we would likely support funding these additional works under the isolated works funding policy. In this instance the funding sought by the club exceeds the current budget for isolated works. We understand the club has estimates to undertake the work which total \$480,000. The club has suggested undertaking this work over 5 years which equates approximately to the \$100,000 per year. The club has sought assistance for the full amount of the works but the Council contribution under the isolated works policy would be 30% of that physical works cost or approximately \$30,000 per year. The current isolated works budget for the western part of the region is \$20,000. It would be considered unfair to commit all of that funding to a single project, so an additional \$30,000 would have to be included in the budget per year for 5 years if this project were to be approved.

Federated Farmers

A framework for the delivery of the riparian/wetland programme has been finalised and development of the support packages and the allocation of staff is underway. Additional resources have been added for administrative support, promotion and information transfer.

2.5 Parks

2.5.1 Park services

2.5.1.1 Summary of key submission themes

Submission numbers 27, 40, 42

Submitters in general supported the maintenance of the parks provided by the Council, however two submitters requested some park work at the Belmont Regional Park.

2.5.1.2 Officer comments

The camping area at Dry Creek is to be reconfigured over the next month so that from October to April, campers will be accommodated in the area behind the hill, closer to the toilets. Camping is permitted on a self-registration, fee-paid basis; a contractor is now closing the gates at 6pm, checking payments have been made and the general state of the area. Parks will propose that a new toilet is provided nearer the park entrance as part of the Annual Plan 2017-18 processes.

GWRC is working with Hutt City Council on the removal of a shed and fence at the park, and HCC as landowner have agreed to require the landowner to remove the shed and fence across this access way.

GWRC thanks Sport Wellington for their support and looks forward to our ongoing collaboration, especially in provision of the Sport Wellington Buggy Walk series.

2.5.2 Additional activities

2.5.2.1 Summary of key submission themes

Submission number 24

The submitter requested that an additional budget be allocated for the replacement of the Baring Head bridge in the East Harbour Regional Park.

2.5.2.2 Officer comments

All Right of Way holders have a corresponding legal obligation to contribute their reasonable share of costs to the maintenance and eventual replacement of this bridge. These Rights of Way remained in place following GWRC's purchase of Baring Head, as they relate to legal access for vehicles. The road through Baring Head is private and members of the public have only non-vehicular access past the carpark.

2.6 Other matters

2.6.1 Office location

2.6.1.1 Summary of key submission themes

Submission number 40

One submitter raised concern over the location of the GWRC offices.

2.6.1.2 Officer comments

GWRC considers Harbour Quays an appropriate location, adequately balancing value for money and profile.

2.6.2 Accountability of CCOs

2.6.2.1 Summary of key submission themes

Submission number 59

One submitter raised concern over public accountability of CCOs and CCTOs, noting the Auditor General's comments regarding CCOs in Auckland.

2.6.1.2 Officer comments

Concerns about the public accountability of CCO and CCTOs are noted. The Local Government Act 2002 sets out the requirements for CCOs, including CCTOs. The Government, in its Better Local Services package, <https://www.dia.govt.nz/better-local-services>, has advised its intention to introduce changes to the legislation that will strengthen the accountability of council-controlled organisations to their local authorities, including requirements for council-controlled organisations to give effect to council long-term plans and to local authority comments on their statements of intent.