Submission speaking points, PDP Hearing Stream 11, 11 September 2024

Dr Paul Blaschke

Introduction

- 1. I'm speaking as an individual submitter. I also appeared in Stream 1 in the same capacity.
- 2. As a former environmental consultant and researcher I have given evidence in many council and judicial hearings. I'm also active in several city and national environmental restoration and advocacy groups.
- 3. I want to briefly address two points in my written submission
 - a. Regarding the identification and delineation of SNAs.
 - b. Regarding the protection and enhancement of urban green space.
- 4. In regard to the second aspect I may have missed the bus because the substantive hearings stream dealing with my written submission point related to the subdivision design guide which was heard in Stream 5. But I'll argue that there is an important connection between urban green space, and ecosystems and biodiversity, that needs to be taken into account in reaching decisions for this hearing stream.
- 5. I may also be able to provide an independent professional ecologist's voice in regard to matters raised in this hearings stream if you have questions.

Significant Natural Areas

- 6. I have read the relevant parts of the s42 report in regard to SNAs. I endorse the thrust of many submitters that SNAs on private land in the urban residential zone should be identified in the notified DP.
- 7. It is not possible to say that the SNAs within private Lots are collectively "less significant" than those SNAs that are on public land.
- 8. SNAs on private land do have public benefits, notwithstanding the property rights of owners.
- 9. I recognise the difficulties in implementation of SNA provisions caused by contradictory National Policy Statements and especially by the Amendment Bill.

Urban Green Spaces

- **10.** I submitted on the importance of the subdivision design guide which included good measures for creating and maintaining urban green spaces in the subdivision process.
- 11. The evidence I submitted to this hearing is an academic article about the importance of UGS in Aotearoa NZ and how its vital roles as "green infrastructure" were being significantly lost in almost all major NZ cities. The paper was partly based on work I and colleagues did for WCC in

- 2019 on UGS did In Wellington in the central city. In Wellington City overall the losses are less pronounced than in some other cities but there are significant and concerning differences in the amount, accessibility and quality of green spaces in different parts of the city.
- **12.** Why is this important? Green spaces are vitally important for health and wellbeing, recreation, social and cultural interaction and inspiration for every resident of the city. But those green spaces also constitute many of the SNAs in the city in other words they have important ecosystem and biodiversity values.
- **13.** All these values together are called **ecosystem services.** They can be simply defined as "the benefits people get from nature", and when I repeat the examples that Mr McCutcheon read out yesterday, like food, clean air, clean water, summer shade, carbon storage, flooding mitigation, places to rest, recreate, feel better and be inspired, people understand the concept well. They are often now called "Nature's Contributions to People".

Urban Green Spaces, SNAs and Ecosystems

- **14.** Many green spaces in Wellington City are also recognised as SNAs. These may be in both public and private ownership.
- **15.** But green spaces that are NOT recognised as SNAs ALSO provide important biodiversity values especially as habitats and linking elements.
- 16. For these reasons, and because of the uneven distribution of green spaces within the city, the proposed new policy ECO-01 ("Indigenous biodiversity is maintained so that there is at least no overall loss in Wellington City") is not satisfactory at the overall city level. It could easily lead to acceleration of inequities in green space values (both biodiversity and wellbeing etc values): under the MDRS they could be stripped right out of the most densely populated parts of the city, even while at the overall city-wide scale there may be no recorded biodiversity loss. This is a matter of environmental justice as well as habitat and linkage values.

Conclusion

- 17. I hope the Panel and the Council can negotiate a way through this complex web of conflicting legislation and policy to come up with a notified Plan (and accompanying design guides) that will give expression to robust ways of maintaining and enhancing UGS at a time of intensification.
- 18. There are many known methods of approaching this challenge. Many are discussed in a recent comprehensive PCE report. There are many successful examples internationally and around Aotearoa NZ (and learnings from unsuccessful examples.