Submission on Proposed Change 1 to the Natural Resources Plan for the Wellington Region, October 2023, from Lynn Cadenhead

Thank you for the opportunity to make a submission to this process.

I organise the Tyers Stream Restoration Group seeking to improve the water and habitat quality of a local stream in Khandallah and am engaging with Te Hononga, a collective of such community catchment groups which has recently been established.

The state of water bodies reflects the use of land, water and other resources in their catchments.

Many of our water bodies have been neglected, piped, drained or land uses in their catchments intensified to the point that their community values have been severely compromised. Despite this, these streams and other water bodies continue to provide species' habitats and are worthy of collective action to improve them to ensure they remain community assets. Only with the support of collective action through the regional plan can we secure and improve our water bodies.

I therefore support the thrust of Plan Change 1 to require specific actions intended to improve our water bodies over time. I would like the timeframes to achieve improved fresh water outcomes to include interim and measurable milestones (such as by 2035) and are not just set several decades in the future. Only in this way can we be sure that the measures being taken are proving effective.

I support the Whaitua process undertaken by Greater Wellington Regional Council, and support moves to implement those recommendations made by Whaitua members to address freshwater issues.

I support the direction in Plan Change 1. with regard to water. Greater Wellington has shown courage to bring this plan change to the public, and I urge councillors to continue to support these changes through to their implementation.

I support the objectives in Chapter 3 with the track changes shown below.

I support the Target Attribute States proposed in Chapter 3 and for Whaitua Te Whanganui-a-Tara with the proviso that if no other date is specified by 31 December 2026 the fall-back date should be 2035. in many cases these are only first step improvements to reverse the decline and get water quality above national bottom lines.

Any waterways that contain giant kokopu, shortjaw kokopu or lampreys should have the highest level of protection as these species are particularly vulnerable to an increase in sediment, temperature or other pollutants.

I believe there should be no new major developments on greenfield land; the existing urban areas in the Wellington Region are sufficient to provide for the increase in housing through densification.

I believe it is essential that all developments that increase the area of impermeable surface including infill housing, mandate at least neutral (or lesser) stormwater runoff compared with predevelopment. Retention of stormwater to manage stormwater volumes to avoid flashy rainfall runoff requires an initial depth of rainwater to be captured and not allowed to discharge as stormwater. I support all objectives, policies and rules that support this.

The costs of the work needed to achieve the outcomes in Proposed Change 1 will be significant but the costs of inaction outweigh those of action. The work will be more expensive in the future and ultimately those costs fall on future generations.

Alter as per the track changes below

3.7 Biodiversity, aquatic ecosystem health and mahinga kai

Objective O19

Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area are safeguarded such that:

(a) water quality, flows, water levels and aquatic and coastal habitats are managed to maintain and improve biodiversity, aquatic ecosystem health and mahinga kai, and

(b) where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a freshwater body or coastal marine area is meaningfully improved so that the objective is met within a reasonable timeframe, and

(c) restoration of aquatic ecosystem health and mahinga kai is undertaken and required where land is developed that contains freshwater bodies. ~~encouraged.~~

Note
For the purposes of this objective 'a reasonable timeframe' is a date for the applicable water body or coastal marine area inserted into this Plan through the plan change/s required by the RMA to implement the NPS-FM 2020, or ~~2050~~ 2035 if no other date is specified by 31 December 2026.

Aquatic ecosystem health and mahinga kai objectives Table 3.4 Rivers and streams, page 16

Mahinga kai species
N/A
Mahinga kai species, including **taonga species**, are present in quantities, size and of a quality that is ~~appropriate for the area~~ and reflective of a healthy functioning ecosystem[18] **Huanga** of **mahinga kai** as identified by **mana whenua** are achieved.

Replace crossed out section of table 3.4 above with; in a healthy ecological state.

I support Objectives 025 and 028

I support Policy P30: Biodiversity, aquatic ecosystem health and mahinga kai.

I support Policy P78: Managing point source discharges for aquatic ecosystem health and mahinga kai.

Rule 5.4.8 makes activities such as dams which have existed for 10 years or more permitted, provided conditions associated with the original permission have been adhered to. This does not address issues around fish passage, which in many cases was not required in earlier consenting. I seek that discretion be available to the Council to require fish passage be provided in such cases, where this would be practical and is required to enable access for fish around an artificial fish passage barrier.

I support the requirement for Freshwater Action Plans required in section 6.16.

Methods M43 and M45 to support the health of, and funding for, urban waterbodies, particularly in relation to stormwater discharges in combination with Wellington Water, is supported. This would also benefit from active endorsement by territorial local authorities in the development of existing and new urban development.

Similarly, Method M44 to support health of rural water bodies is also supported.

Chapter 8 Whanganui-a-Tara

The objectives WH.01-WH.09 are supported, but as noted above, specific interim milestones are also required to be set to ensure the long-term objective will be achieved. This must be supported by numerical objectives and monitoring programmes to ensure actions are effective to meet the desired outcomes.

I support the numerical requirements for the lakes being accompanied by the equivalent for running waters; particularly the Hutt River catchment such as in Table 8.3. In all cases, human health for contact recreation should be the standard where the water bodies are used for that purpose. The desired target attribute states in Table 8.4 are supported.

Policies WH.P1 to WH.P33 are all supported, including the associated target attribute states and flow requirements.

Rules WH.R1 to WH.R36 are all supported. Note that, wherever possible, water sensitive urban design should be required to minimise increased runoff intensity due to increasing hard surfaces.

Chapter 9 Te Awarua-0-Porirua

I support the provisions in this chapter.