

View Submitter Details

Submitter No.	S113
Submitter Name	Zealandia Te Māra a Tāne
Online submitter	Yes
Raw submission lodged	Yes

Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

Raw sub point number	Provision	Support/oppose	Decision sought	Reasons
S113.1	5.4.4 Uses of beds of lakes and rivers general conditions.	Support	We support the protection of beds of lakes and rivers, with specific considerations for the protection of inanga.	
S113.2	Rule R133: Gravel extraction for flood protection purposes or erosion mitigation inside sites of significance – discretionary activity.	Amend	We recommend that discretionary activity for gravel extraction from river beds considers hard infrastructural improvements required to dechannelise riverbanks.	The Kaiwharawhara estuary may benefit from the installation of planter boxes alongside concrete walls. This would enhance inanga spawning habitat, provide flow variation alongside the stream and have overall positive environmental outcomes.
S113.3	Method M40: Fish passage action plan programme for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Support	We support addressing and minimising the environmental impacts of fish barrier to promote diadromous species to complete their lifecycles.	
S113.4	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	We recommend to increase the frequency of information published on degrading water bodies trends from at least once every five years to once every three years.	
S113.5	Method M45: Funding of wastewater and stormwater network upgrades	Support	We support improved water quality outcomes with specific funding allocated towards stormwater and wastewater network upgrades.	For generations, the Kaiwharawhara awa has endured harm due to stormwater and wastewater overflows. This harm violates the principles of Te Mana o Te Wai. Currently, Wellington Water Ltd. is not adequately resourced to upgrade sewerage networks within their allocated funding.
S113.6	Objective WH.O1: The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.	Support	We support establishing a vision to restore the āhua of freshwater bodies by 2100 with specific goals to accomplish this vision in the interim.	This aspiration aligns with the 100-year vision of Sanctuary to Sea Kia Mouri ora te Kaiwharawhara to restore the mouri of the Kaiwharawhara catchment, so that the wellbeing of te awa, te ngahere, and ngā tāngata are restored and thriving.

S113.7	Objective WH.O3: The health and wellbeing of coastal water quality, ecosystems and habitats in Te Whanganui-a-Tara is maintained or improved to achieve the coastal water objectives set out in Table 8.1.	Support	We support establishing a vision to restore the ahuao of freshwater bodies by 2100 with specific goals to accomplish this vision in the interim.	In relation to providing the means for mana whenua to connect with Ngā Taonga Nui a Kiwa (WH.O3(h)), we are concerned that current development works at the mouth of the Kaiwharawahra estuary intend to permanently restrict public access. We believe that in order for an ecosystem to thrive, sustainable and responsible access must be preserved.
S113.8	Table 8.2 Target attribute states for lakes.	Support	We support promoting water sensitive urban design in new and upgraded development works, with particular focus on stormwater and hydrological control plans.	
S113.9	Policy WH.P12: Managing stormwater from a port or airport.	Support	We support promoting water sensitive urban design in new and upgraded development works, with particular focus on stormwater and hydrological control plans	The Kaiwharawahra awa stands to benefit immensely from an overall reduction of copper and zinc concentrations in stormwater systems.
S113.10	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Amend	<p>We suggest adding 'reach of tidal influence' to the inanga spawning habitat column as per report "Inanga spawning habitat quality, remediation and management in the Wellington Region; Marshall & Taylor 2017" Prepared for GWRC.</p> <p>We suggest adding kākahi/freshwater mussel (<i>Echyridella menziesii</i>) (At Risk declining) and <i>E. aucklandica</i> (Threatened - Nationally Vulnerable) to nationally threatened freshwater species column.</p> <p>Both of these species have been reintroduced to the upper catchment in</p> <ul style="list-style-type: none"> Zealandia Te Māra a Tāne. 	
S113.11	A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara.	Amend	<p>We support the existing list of attributes in Schedule 27 A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara</p> <ul style="list-style-type: none"> • We strongly suggest the addition of <i>E. coli</i> and deposited fine sediment to the Kaiwharawahra stream list of attributes 	Both of these attributes are increasingly problematic for the whaitua with erosion increasing in severe weather events increasing sediment loading of the awa and significant wastewater pipe overflows introducing fecal matter to the awa (as noted by the baseline E rating).

Raw submission documents

These are files that were uploaded as part of an online submission.

Document name	File	Description	Upload date
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Zealandia Te Māra a Tāne
Feedback on PC1 NRP

[feedbackongwrcproposedchange1tonrp.pdf](#)

We had prepared a written statement originally. Please find the main points attached. Thank you very much for your hard work.

15/12/2023
09:54



Feedback on Greater Wellington Regional Council's Proposed Change 1 to the Natural Resources Plan for the Wellington Region

Zealandia Te Māra a Tāne
December 2023

Prepared by Dr Nate Rigler, Sanctuary to Sea | Kia Mouriora te Kaiwharawhara Project Lead

- Sanctuary to Sea | Kia Mouriora te Kaiwharawhara is a collaborative, integrated management group for the Kaiwharawhara catchment included within the geographic scope of Te Whaitua te Whanganui-a-Tara. Over 30 community groups are active in the catchment and our strategy group is made up of representatives from Taranaki Whānui, GWRC, WCC, DOC, CentrePort, Morpium Environmental, GHD and Zealandia Te Māra a Tāne.
- Zealandia Te Māra a Tāne values our relationships within Te Hononga ki te Upoko | Wellington Catchments Collective. This network is made up of representatives from catchment restoration groups throughout the Wellington Region. We encourage inter-catchment collaboration through regular meetings, information sharing, and site visits.
- **Due to time constraints, this submission is made on behalf of Zealandia Te Māra a Tāne only.** However, we do so with the best interests of the Kaiwharawhara catchment at heart and are guided by the long term aspirations and 100 year vision of Sanctuary to Sea | Kia Mouriora te Kaiwharawhara.
- The ecological and cultural values of the Kaiwharawhara awa reflect national priorities under the Freshwater NPS. These include:
 - Nationally high values for threatened freshwater species; e.g. waterbodies in the catchment have reintroduced populations of the Nationally Vulnerable species *Echyridella aucklandia* and the Declining *Echyridella menziesii*, as well as long finned eel (At Risk – Declining); spotted eel were also detected in the catchment in 2021.
 - The waterbody has the largest grove of Nationally Critical threatened swamp maire in the Wellington Region, which is subject to nationally important research into cryopreservation techniques.
 - Regionally significant human-made wetland areas are present in Zealandia Te Māra a Tāne, for which there are no other examples in the Wellington City area.
 - The catchment headwaters (Zealandia Te Māra a Tāne) is the home, and in many cases, the source for the wider landscape of numerous terrestrial species (including a number that are highly threatened) that have been reintroduced and are now thriving and are present in the catchment. These species rely on the health of the waterways for persistence; this includes little spotted kiwi, Maud Island frogs, and tuatara.
 - It is the only urban stream connected to a tidal estuary and headwaters in Wellington.
 - It has significant mana whenua values with a large project underway to explore possibilities for recognition of legal personhood, and a significant pā site at the estuary.
 - Major biodiversity initiatives have already occurred in the catchment, including the eradication of perch and trout from the headwaters, reintroduction of species, and one of the first examples of a fish reintroduction (toitoi / common bully) for conservation purposes.

- **In principle, Zealandia Te Māra a Tāne supports the whole of Greater Wellington Regional Council's proposed changes to the Natural Resources Plan, with several recommended amendments.** In particular we support:
 - The intent to stop further degradation of freshwater bodies in the Wellington region.
 - The collaborative planning process involving Whaitua committees that has resulted in these proposed plan changes that reflect the needs and aspirations of the community and mana whenua.
 - The protection of beds of lakes and rivers, with specific considerations for the protection of inanga (5.4.4).
 - We recommend that discretionary activity for gravel extraction from river beds considers hard infrastructural improvements required to dechannelise river banks (R133).
 - For example, the Kaiwharawhara estuary may benefit from the installation of planter boxes alongside concrete walls. This would enhance inanga spawning habitat, provide flow variation alongside the stream and have overall positive environmental outcomes.
 - Addressing and minimising the environmental impacts of fish barriers to promote diadromous species to complete their life cycles (6.16; M39; M40).
 - We recommend to increase the frequency of information published on degrading waterbodies trends from at least once every five years to once every three years (M41).
 - Supporting improved water quality outcomes (6.16) with specific funding allocated towards stormwater and wastewater network upgrades (M45).
 - For generations, the Kaiwharawhara awa has endured harm due to stormwater and wastewater overflows. This harm violates the principles of Te Mana o Te Wai. Currently, Wellington Water Ltd. is not adequately resourced to upgrade sewerage networks within their allocated funding.
 - Establishing a vision to restore the āhua of freshwater bodies by 2100 (WH.01) with specific goals to accomplish this vision in the interim (WH.02).
 - This aspiration aligns with the 100-year vision of Sanctuary to Sea | Kia Mouriora te Kaiwharawhara to restore the mouri of the Kaiwharawhara catchment, so that the wellbeing of te awa, te ngahere, and ngā tāngata are restored and thriving.
 - In relation to providing the means for mana whenua to connect with Ngā Taonga Nui a Kiwa (WH.03(h)), we are concerned that current development works at the mouth of the Kaiwharawhara estuary intend to permanently restrict public access. We believe that in order for an ecosystem to thrive, sustainable and responsible access must be preserved.
 - Promoting water sensitive urban design in new and upgraded development works, with particular focus on stormwater and hydrological control plans (8.2.2).
 - The Kaiwharawhara awa stands to benefit immensely from an overall reduction of copper and zinc concentrations in stormwater systems (WH.P12 (b, c, d, e)).
 - We suggest providing additional information to the Schedule F1 Kaiwharawhara Stream.
 - We suggest adding 'reach of tidal influence' to the inanga spawning habitat column as per report "Inanga spawning habitat quality, remediation and management in the Wellington Region; Marshall & Taylor 2017" Prepared for GWRC.

- We suggest adding kākahi/freshwater mussel (*Echyridella menziesii*) (At Risk declining) and *E. aucklandica* (Threatened- Nationally Vulnerable) to nationally threatened freshwater species column.
 - o Both of these species have been reintroduced to the upper catchment in Zealandia Te Māra a Tāne.
- We support the existing list of attributes in Schedule 27 A2 Freshwater Action Plans required in Whaitua Te Whanganui-a-Tara
 - o We strongly suggest the addition of *E. coli* and deposited fine sediment to the Kaiwharawhara stream list of attributes for which Freshwater Action Plans will be prepared.
 - o Both of these attributes are increasingly problematic for the whaitua with erosion increasing in severe weather events increasing sediment loading of the awa and significant wastewater pipe overflows introducing fecal matter to the awa (as noted by the baseline E rating).
- **We appreciate the tough economic climate that is currently faced by government and communities. However, we strongly advocate for the implementation of the proposed changes in the timeframes proposed to ensure that Wellington continues to be an exemplar of urban biodiversity management and further degradation of freshwater is halted.**
- **Zealandia Te Māra a Tāne would like to remain involved in further consultations and community engagement opportunities of this submission process.**
- We sincerely thank Greater Wellington Regional Council for their hard work and dedication towards fostering an environmentally flourishing region.