






Appendix 1

Hearing Stream 3 – Natural Form and Function

Summary of Fish and Game Submissions on proposed Greater Wellington Natural Resources Plan and Recommendations by s42A Officer

Submission Ref.	Provision	Submission is that:	Reason	Relief Sought	Recommendation of Reporting Officer in s42A Report	Summary of relief sought and location of discussion in planner evidence
s308/007	Section 2 Definition	Support with amendments	<p>Fish and Game consider the proposed plan does not provide for the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.</p> <p>Natural Character is not natural state or naturalness but rather “<i>is that dimension of its character which is an expression of nature, and also may include anthropogenic values including cultural and aesthetic values</i>”, and includes the extent to which natural elements, patterns and processes occur. The preservation of Natural character is a matter of national importance under s6 RMA. The preservation of the natural character of freshwater can be provided for by ensuring the physical naturalness of these environments which make up its natural character are protected and where degraded restored, and that hydrological regimes (including allocations, minimum flows, and supplementary takes) are established which ensure natural processes including the movement of periphyton, sediment, and creation of habitats including pools and riffles, are provided for, along with the lifecycle requirements of fish. The preservation of the natural character of freshwater is also intimately linked to the protection of its life supporting capacity and ecosystem health, along with recreational and Maori values including Mahinga Kai. As currently drafted the Natural Resource Plan will not achieve s6(a) RMA.</p>	<p>Include a new Definition for Natural Character</p> <p><u><i>The Natural Character of rivers lakes and wetlands may include such attributes and characteristics as:</i></u></p> <ul style="list-style-type: none"> a) <u><i>natural elements, processes and patterns, chemical, biophysical, ecological, geological, geomorphological and morphological aspects, natural landforms;</i></u> b) <u><i>the natural movement of water and sediment including hydrological and fluvial processes;</i></u> c) <u><i>places that are wild and scenic</i></u> d) <u><i>a range of natural character from pristine to modified</i></u> <p>Include or amend objectives policies and rules to recognise and protect the natural character of rivers, lakes, wetlands and their margins from land use activities, discharges, water takes, and the management of the beds and margins of waterbodies.</p>	<p>Reject</p> <p>S42A report – Topic: Natural Form and Function paras 113-117.</p>	<p>Seek that definition for natural character is included in the Interpretation section of the pNRP:</p> <p><u><i>The natural character of the coastal environment (including the coastal marine area), rivers, lakes and wetlands may include such attributes and characteristics as:</i></u></p> <ul style="list-style-type: none"> a) <u><i>Natural elements, processes and patterns;</i></u> b) <u><i>Hydrological and fluvial processes, including wave formation, breaking and dissipation; swash run-up; nearshore currents; sediment transport, erosion and deposition, flooding, river meandering, aggradation and mass movement;</i></u> c) <u><i>Natural processes include chemical, geophysical, biophysical, geological, geomorphological and morphological processes;</i></u> d) <u><i>Ecological aspects, including the relative dominance of indigenous flora and fauna and the presence of culturally significant species;</i></u> e) <u><i>The colour and clarity of the water;</i></u> f) <u><i>Natural landforms and features, such as beaches, dunes, wetlands, and rivers;</i></u> g) <u><i>The nature and extent of modifications to a place, site or area;</i></u> h) <u><i>Places that are wild and scenic;</i></u> i) <u><i>A range of natural character from pristine to modified;</i></u> j) <u><i>Experiential attributes, including sounds and smells, and their context and setting; and</i></u> k) <u><i>The special association with a place, site or area that a community may have, and the contribution that makes to a community’s sense of identity.</i></u> <p>Delete definition for ‘natural processes’.</p> <p>Paragraphs 20-30</p>
s308/008	Entire Plan	Amend		<p>Include or amend objective, policies and rules to recognise and protect the natural character of rivers, lakes, wetlands and their margins from land use activities, discharges, water takes, and the management of the beds and margins or waterbodies.</p>	<p>Accept in part</p> <p>S42A report – Topic: Natural Form and Function paras 525-533</p>	<p>Addressed in evidence overall, and in the relief sought in Appendix 2.</p>
s308/018 s308/019	Section 3.4 and objectives 017, objective 019, and 022	Support with amendments	<p>The preservation of Natural character is a matter of national importance under s6 RMA. Natural Character is not constrained to natural state or naturalness but rather “<i>is that dimension of its character which is an expression of nature, and also may include anthropogenic values including cultural and aesthetic values</i>”, and includes the extent to which natural elements, patterns and processes occur. The preservation of the natural character of freshwater can be provided for by ensuring the physical naturalness of these environments which make up its natural character are protected and where degraded restored, and that hydrological regimes (including allocations, minimum flows, and supplementary takes) are</p>	<p>Amend section 3.4 and objectives 017, 019, and 022 to:</p> <p><u><i>Recognise and preserve the natural flow characteristics and hydrodynamic processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands,</i></u></p> <p><u><i>Recognise and preserve aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats.</i></u></p> <p><u><i>Recognise and preserve freshwater habitats that are important to the life cycle and survival of aquatic</i></u></p>	<p>In respect of O17 Accept in part</p> <p>In respect of O19 Reject</p> <p>S42A report – Topic: Natural Form and Function paras 149-161.</p>	<p>Seek that O17 and O19 are amalgamated. O22 will form part of the discussion at Hearing Stream 5.</p> <p>Objective O17  The natural character of the coastal marine area, natural wetlands, rivers, lakes and their margins and natural wetlands is preserved and protected from inappropriate use and development, and restored and rehabilitated where it is degraded.</p> <p>Objective O19  The interference from use and development on natural</p>

Submission Ref.	Provision	Submission is that:	Reason	Relief Sought	Recommendation of Reporting Officer in s42A Report	Summary of relief sought and location of discussion in planner evidence
			established which ensure natural processes including the movement of periphyton, sediment, and creation of habitats including pools and riffles, are provided for, along with the lifecycle requirements of fish. The preservation of the natural character of freshwater is also intimately linked to the protection of its life supporting capacity and ecosystem health, along with recreational and Maori values including Mahinga Kai. As currently drafted the Natural Resource Plan will not achieve s6((a) RMA or sustainable management	<p><u>species.</u></p> <p><u>avoid effects of land use activities and activities on the margins of freshwater bodies and their beds at times which will affect the breeding, spawning, and dispersal or migration of aquatic species.</u></p> <p><u>avoid activities and the placement of structures in the bed of freshwater environments which would create barriers to the migration or movement of indigenous aquatic species.</u></p> <p><u>restore natural character including the connections between fragmented aquatic habitats where degraded.</u></p> <p>Specifically require that flood protection and river management activities are undertaken in a manner which recognises and protects the natural character of freshwater and enhances natural character where degraded such that the provisions listed above are achieved and the natural character narrative and index in Table 3.4 Appendix 3 to this report is met.</p>		processes is minimised. See also Appendix 2 for amendments to O25 and Table 3.4 of the pNRP.
FS89/024 on s352/068 Federated Farmers	O17	Oppose		Disallow	Reject S42A report – Topic: Natural Form and Function paras 166-178.	Noted
FS89/026 on s352/070 Federated Farmers	O19	Oppose		Disallow	Reject S42A report – Topic: Natural Form and Function, page 39 of 45	Noted
s308/147	Section 3.7 Objective 031	Support with amendment	<p>As currently proposed NRP does not recognise nor protect outstanding freshwater bodies, nor achieve the provisions of the RPS in relation to outstanding natural features and landscapes. The outstanding waterbodies identified Schedule A only identify outstanding indigenous ecosystem values and fails to apply criteria which is more holistic and which would identify outstanding status for other values such as tangata whenua values, recreational values, trout habitat values, aesthetic, amenity, natural features and landscape, natural character, coastal environments.</p> <p>Fish and Game supports the identification and protection of the values of outstanding water bodies. While some outstanding water bodies are worthy of preservation in or near to their pristine state, most are outstanding due to the high value they provide for particular values. It is important this objective reflects this and recognises that any restoration process for outstanding waters returns them to an outstanding state in respect of the values for which they are regarded as outstanding.</p>	<p>Amend the objective, policies and rules to ensure that outstanding waterbodies are identified based on a full assessment of their values including: cultural values, amenity, aesthetic, recreational, trout habitat, natural character, natural features and landscape, tangata whenua values, mahinga kai. That the criteria for identifying outstanding waterbodies is set out, and that the following waterbodies are included in Schedule A as outstanding waterbodies</p> <ul style="list-style-type: none"> • Hutt river source to sea • Ruamahanga River source to sea • Lake Wairarapa • All natural wetlands • Lake Onoke • Mangaterere River • Whakatikei River • Akatarawa River • Waingawa River above cable way • Waiohine River • Otaki River above gorge • Waikanae River <p><u>Outstanding fresh water bodies and their margins are identified and included in Schedule A, and are protected or if degraded are restored to protect and enhance their values</u></p> <p>Include provisions to protect high naturalness sites</p>	Reject S42A report – Topic: Natural Form and Function, page 35 of 45 Note: the s42A report focuses on the request to include provisions to protect high naturalness sites and natural character, not Fish and Game’s submission point specifically.	O31 will be considered at Hearing Stream 5. Paragraphs 60-62.

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				<p>Include provisions to protect natural character</p> <p>Such other or further relief as addresses the appeal point</p>		
FS89/044 on s352/090 Federated Farmers	O32 Outstanding natural features and landscapes	Oppose		Disallow	Reject S42A report – Topic: Natural Form and Function paras 354-361.	Noted
s308/054	Policy P25	Supported with amendments	<p>Policies and methods (including rules) in relation to recognising and providing for the preservation of Natural character should be incorporated and or strengthened in order to give effect to s6 RMA and promote sustainable management.</p> <p>Natural Character is not natural state or naturalness but rather “is that dimension of its character which is an expression of nature, and also may include anthropogenic values including cultural and aesthetic values”, and includes the extent to which natural elements, patterns and processes occur. The preservation of Natural character is a matter of national importance under s6 RMA. The preservation of the natural character of freshwater can be provided for by ensuring the physical natural of these environments which make up its natural character are protected and where degraded restored, and that hydrological regimes (including allocations, minimum flows, and supplementary takes) are established which ensure natural processes including the movement of periphyton, sediment, and creation of habitats including pools and riffles, are provided for, along with the lifecycle requirements of fish.</p> <p>The preservation of the natural character of freshwater is also intimately linked to the protection of its life supporting capacity and ecosystem health, along with recreational and Maori values including Mahinga Kai. As currently drafted the Natural Resource Plan will not achieve s6(a) RMA.</p>	<p>Amend policy P25 so that it is consistent with the following principals</p> <p><u>Protects the life supporting capacity and ecological health and processes of freshwater</u></p> <ul style="list-style-type: none"> • <u>Protects cultural values and mahinga kai</u> • <u>Recognises and provides for the habitat of trout and indigenous fish species</u> • <u>Recognises and provides for recreational values</u> • <u>Protects the natural character of the freshwater environment and ensures that the NCI index in table 3.4 is achieved</u> • <u>Provides for the natural flow characteristics and hydrodynamic processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands, and avoids adverse effects on these parameters</u> • <u>Recognises and provides for aquatic habitat diversity and quality, including the form, frequency and pattern of pools, runs, and riffles in rivers, and the natural form of rivers, lakes, natural wetlands and coastal habitats, and avoids adverse effects on these parameters</u> • <u>Recognises and provides for habitats that are important to the life cycle and survival of aquatic species, and avoids adverse effects on these parameters</u> • <u>avoids effects at times which will most affect the breeding, spawning, and dispersal or migration of aquatic species</u> • <u>avoids creating barriers to the migration or movement of indigenous aquatic species, and restore the connections between fragmented aquatic habitats where appropriate</u> 	<p>Accept in part</p> <p>S42A report – Topic: Natural Form and Function, page 34 of 45</p>	<p>Delete P25 as notified. Replace with:</p> <p>Policy P25: Natural character  <u>When making decisions on resource consent applications for subdivision, use and development that may affect natural character, the Regional Council must have regard to:</u></p> <ol style="list-style-type: none"> <u>The avoidance of any adverse effects on natural character. Where avoidance is not reasonably practicable, the adverse effects must be remedied or mitigated; and</u> <u>Achieving the relevant numerical and narrative values in HQI index in Table 3.4; and</u> <u>Whether the activity is of an appropriate form, scale and design to be compatible with the existing landforms, geological features and vegetation; and</u> <u>The cumulative effects of the activity, by itself or in combination with effects of other activities, on natural character; and</u> <u>Whether there are alternative locations, design or form of development that have less adverse effects; and</u> <u>Providing for the restoration and rehabilitation of natural character where that is appropriate and practicable.</u> <p>2.1.1 Natural processes</p> <p>Policy P26: Natural processes  Use and development will be managed to minimise effects on the integrity and functioning of natural processes.</p> <p>Alternative relief if primary relief (a definition of natural character in the Interpretation section of the pNRP) is not provided.</p> <p>Policy P25: Natural character </p> <ol style="list-style-type: none"> <u>The natural character of the coastal marine area, rivers lakes and wetlands may include such attributes and characteristics as:</u> <ol style="list-style-type: none"> <u>Natural elements, processes and patterns;</u> <u>Hydrological and fluvial processes, including wave formation, breaking and dissipation; swash run-up; nearshore currents; sediment transport, erosion and deposition, flooding, river meandering, aggradation and mass</u>

Submission Ref.	Provision	Submission is that:	Reason	Relief Sought	Recommendation of Reporting Officer in s42A Report	Summary of relief sought and location of discussion in planner evidence
						<p><u>movement;</u></p> <p>iii. <u>Natural processes include chemical, geophysical, biophysical, geological, geomorphological and morphological processes;</u></p> <p>iv. <u>Ecological aspects, including the relative dominance of indigenous flora and fauna and the presence of culturally significant species;</u></p> <p>v. <u>The colour and clarity of the water;</u></p> <p>vi. <u>Natural landforms and features, such as beaches, dunes, wetlands, and rivers;</u></p> <p>vii. <u>The nature and extent of modifications to a place, site or area;</u></p> <p>viii. <u>Places that are wild and scenic;</u></p> <p>ix. <u>A range of natural character from pristine to modified;</u></p> <p>x. <u>Experiential attributes, including sounds and smells, and their context and setting; and</u></p> <p>xi. <u>The special association with a place, site or area that a community may have, and the contribution that makes to a community's sense of identity.</u></p> <p>b) <u>When making decisions on resource consent applications for subdivision, use and development that may affect natural character of the coastal marine area, natural wetlands and rivers, lakes and their margins, the Regional Council must have regard to:</u></p> <p>i. <u>The avoidance of any adverse effects on natural character. Where avoidance is not reasonably practicable, the adverse effects must be remedied or mitigated; and</u></p> <p>ii. <u>Achieving the relevant numerical and narrative values in HQL index in table 3.4; and</u></p> <p>iii. <u>Whether the activity is of an appropriate form, scale and design to be compatible with the existing landforms, geological features and vegetation; and</u></p> <p>iv. <u>The cumulative effects of the activity, by itself or in combination with effects of other activities, on natural character; and</u></p> <p>v. <u>Whether there are alternative locations, design or form of development that have less adverse effects; and</u></p> <p>vi. <u>Providing for the restoration and rehabilitation of natural character where that is appropriate and practicable.</u></p> <p>Delete P26. Paragraphs 43-55</p>
FS89/070 on s352/134 Federated Farmers	P25 Natural Character	Oppose		Disallow	Reject S42A report – Topic: Natural Form and Function, page 40 of 45	Noted
FS89/071 on s352/135 Federated Farmers	P26 Natural Processes	Oppose		Disallow	Reject S42A report – Topic: Natural Form and Function, page 40 of 45	Noted

Submission Ref.	Provision	Submission is that:	Reason	Relief Sought	Recommendation of Reporting Officer in s42A Report	Summary of relief sought and location of discussion in planner evidence
s308/139	Include new method	Oppose	The plan fails to recognise and protect the natural character of rivers.	Include a new method to monitor and report on the natural character of rivers and their natural character index in assessing how the natural character provisions of the plan and table 3.4 natural character narrative and numerical freshwater objectives are being met.	Reject S42A report – Topic: Natural Form and Function, page 34 of 45	<p>Insert new method:</p> <p>Method M10a: Natural Character</p> <p>Wellington Regional Council will work in partnership with Department of Conservation, Fish & Game New Zealand, research institutes, universities, non-Government agencies, community groups and iwi authorities as required to develop an integrated research, monitoring and reporting programme on the natural character of the Region's rivers. The programme will support the delivery and refinement of the natural character objectives, policies and methods in the Plan, including the natural character narrative and numerical fresh water objectives in Table 3.4 of the Plan. The outcomes will be reported in the Council State of the Environment Report and also guide implementation planning and allow implementation effectiveness to be assessed.</p> <p>Paragraphs 41-42</p>

