

**Before the Hearing Panel
at Wellington**

UNDER the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF Proposed Natural Resources Plan for the Wellington Region (Hearing Stream 3)

**PLANNING EVIDENCE OF LUCY ELIZABETH COOPER ON BEHALF OF WELLINGTON
FISH AND GAME COUNCIL:
HEARING STREAM 3
NATURAL FORM AND FUNCTION**

Dated: 22 August 2017

EXECUTIVE SUMMARY

1. The inclusion of a definition of “Natural Character” would provide certainty to decision makers and plan users as to the matters that should be taken into account when considering how activities affect the natural character of lakes, rivers, wetlands and their margins and the coastal environment.
2. Alternatively the elements that make up “Natural Character” should be set out in Policy P25.
3. The HQI tool should be referred to in the Objectives of the pNRP as a means of providing the Council with a practical, efficient and effective means to meet its natural character objectives and obligations under s6(a) of the RMA.
4. A new method should be included to direct the Council to develop, in collaboration with other agencies and stakeholders, an integrated research, monitoring and reporting programme on the natural character of the Region’s rivers. This programme will better ensure that the natural character objectives of the pNRP are achieved at the catchment-wide level and in respect of individual projects and works that may affect the natural character of rivers, wetlands and lakes and their margins.
5. The preferred relief sought would result in the amalgamation of Objectives O17 and O19, and Policies P25 and P26.

INTRODUCTION

Qualifications and Experience

6. My full name is Lucy Elizabeth Cooper. I have a Masters in Town and Country Planning from the University of the West of England in the United Kingdom. I am also a qualified RMA decision-maker under the 'Making Good Decisions' programme.
7. I have over 15 years experience in resource management and planning, gained in the UK and, since 2007, New Zealand. My particular areas of expertise are in policy and plan development and natural resource management. Most recently, I have developed planning policy, prepared s42A reports and presented at hearings in respect of network utilities, hazardous substances and contaminated land, and rural land use provisions. I have also prepared expert planning evidence as part of a judicial review process instigated by a private individual in the Wairarapa.

My previous involvement with the Proposed Natural Resources Management Plan

8. My previous involvement in the pNRP is set out in my planning evidence for Hearing Stream 1, and a memo to the Commissioners dated 16 June 2017.

Code of Conduct for Expert Witnesses

9. I have read the Code of Conduct for Expert Witnesses (Section 7 of the Environment Court Consolidated Practice Note 2014) and I agree to comply with this Code of Conduct. This evidence is within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of my evidence

10. For this hearing I have been asked by Fish and Game to prepare evidence in relation to the submissions and further submissions made by Fish and Game on the Proposed Natural Resources Plan for the Wellington region providing for natural character and natural processes.

11. Specifically, Fish and Game made submissions on the following provisions that have been identified in Ms Legarth's s42A report as forming part of Hearing Stream 3:

- Objective O17 Natural Character;
- Objective O19 Natural Processes;
- Policy P25 Natural Character; and
- Policy P26 Natural Processes.

12. In preparing this evidence, I have read the following documents:

- Section 42A report – Natural Form and Function, prepared by Ms Yvonne Legarth;
- The evidence of Professor Russell Death on behalf of Fish and Game.

13. Throughout this evidence I use the following terminology and abbreviations:

- Greater Wellington Regional Council is referred to as GWRC or the Council;
- The Proposed Natural Resources Plan is described as the pNRP or the Plan;
- The Regional Planning Statement is referred to as the RPS;

- The New Zealand Coastal Policy Statement is referred to as the NZCPS; and
- The National Planning Statement for Freshwater Management 2014 is the NPSFM.

Legislative and Policy Setting

14. I have read the statutory context summarised in the s42A Reports provided for the natural form and function Hearing 3 and agree with that summary.

Summary of Fish and Game's Submission

15. Fish and Game's original submission sought relief to ensure that the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins is recognised and preserved. The natural character of rivers encompasses a river's natural form and processes, such as hydrological, geomorphological and fluvial processes.

16. The relief sought in the original submission related to natural form and function falls broadly into two categories:

- i. Amendments to objectives and policies to ensure the protection and preservation of natural character in the region is consistent with the outcomes envisaged by s6(a) of the Resource Management Act 1991 (RMA); and
- ii. The establishment of water quality and quantity limits and methods that protect the life supporting capacity and ecosystem health of water, and thereby preserve the natural character of freshwater.

17. The focus of this evidence will be the matters in (i). Matters in (ii) will be addressed in the planning evidence of Mr Percy.

18. The purpose of the amendments sought by Fish and Game are to ensure that the provisions of the pNRP recognise and facilitate the preservation of the natural character of freshwater by ensuring the physical naturalness of these environments, which make up its natural character, are protected and where degraded restored. The relief also sought 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 original submission seeks a link between the preservation and protection of natural character of freshwater and the protection of its life supporting capacity and ecosystem health, along with recreational and Māori values including mahinga kai.
19. The key elements of Fish and Game's approach to providing for, protecting and preserving natural character in the region set out in the submission are as follows:
- The inclusion of a definition of natural character;
 - Objectives to provide for factors key to the overall preservation and protection of natural character in freshwater habitats;
 - a management framework for activities in that may affect natural character;
 - The inclusion of the Habitat Quality Index (HQI (referred to in the original submission as Natural Character Index or NCI) into Table 3.4, Aquatic Ecosystem Health and Mahinga Kai (related to O25 of the pNRP);
 - Amendments Policy P25; and
 - Inclusion of 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.

20. Appendix 1 of this evidence sets out each of the submission points pertaining to natural form and function, the relief sought by Fish and Game, the s42A officer's recommendation, whether Fish and Game accepts the officer's recommendation and, if not, alternative wording.
21. Appendix 2 sets out a redline version of the relevant provisions of the pNRP incorporating the relief sought in this evidence.

Evidence

Definition of Natural Character

[Submission point s308/007, S42A report – Topic: Natural Form and Function paras 113-117]

22. Fish and Game's original submission sought the inclusion of a definition for natural character in the Interpretation section of the pNRP as necessary to achieve recognition of the matter of national importance s6(a) of the RMA.
23. Ms Legarth rejects Fish and Game's request on the basis that "natural character is well defined in case law, and the NZCPS also sets out what the components of natural character are" (paragraph 116, S42A report).
24. I disagree with Ms Legarth's conclusions.
25. I consider it important that a person reading the pNRP should be able to understand the meaning of "natural character" without recourse to these other documents. Providing a definition is consistent with best practice guidance at www.qualityplanning.co.nz:

Definitions are used to give a standard meaning to words or phrases that occur frequently throughout a plan. The use of definitions avoids repetition and promotes consistency in interpretation. As the defined terms are usually part of, and crucial to, policies and rules, the same level of care should be taken in their drafting.

26. A definition would enable “natural character” to be readily understood and applied when interpreting policy and assessing the effects of activities related to that concept. Policy 13 of the NZCPS, Preservation of natural character, is a useful guide for Councils and resource users. However, it is specifically directed to considerations of natural character in the coastal environment (including the coastal marine environment).
27. The matters set out in Policy 13(2) of the NZCPS are not exhaustive, and provide for the consideration of other matters on a case-by-case basis:

13(2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:

- (a) natural elements, processes and patterns;*
- (b) biophysical, ecological, geological and geomorphological aspects;*
- (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;*
- (d) the natural movement of water and sediment;*
- (e) the natural darkness of the night sky;*
- (f) places or areas that are wild or scenic;*
- (g) a range of natural character from pristine to modified; and*
- (h) experiential attributes, including the sounds and smell of the sea; and their context or setting (my emphasis added).*

28. Natural form and function is defined in Appendix 1 of the NPSFM (as amended)¹ as follows:

Matters contributing to the natural form and character of a freshwater management unit are its biological, visual and physical characteristics that are valued by the community, including:

- i. its biophysical, ecological, geological, geomorphological and morphological aspects;*
- ii. the natural movement of water and sediment including hydrological and fluvial processes;*
- iii. the location of the water body relative to its natural course;*
- iv. the relative dominance of indigenous flora and fauna;*
- v. the presence of culturally significant species;*
- vi. the colour of the water; and*
- vii. the clarity of the water.*

29. Policy 3 of the RPS also provides a list of attributes and characteristics of natural character to be considered when assessing natural character in the coastal environment:

Natural character should be assessed considering the following matters [...]:

(a) The extent to which natural elements, patterns and processes occur, including:

- (i) natural elements: the products of natural processes – such as landforms, water forms, vegetation and land cover;*
- (ii) natural processes: the ecological, climatic and geophysical processes that underlie the expression and character of the place, site or area;*

¹ The NPSFM 2014 was updated in August 2017 to incorporate amendments from the National Policy Statement for Freshwater Amendment Order 2017 and will take effect from 6 September 2017.

(iii) natural patterns: the visual expression or spatial distribution of natural elements which are, or which appear to be, a product of natural processes; and/or

(iv) surroundings: the setting or context, such that the place, site or area contributes to an understanding of the natural history of the wider area.

(b) The nature and extent of modifications to the place, site or area, including, but not limited to:

(i) physical alterations by people to the landscape, its landforms, waterforms, vegetation, land cover and to the natural patterns associated with these elements;

(ii) the presence, location, scale and density of buildings and structures, including infrastructure, whether appearing to be interconnected or isolated, and the degree of intrusiveness of these structures on the natural character of the place;

(iii) the temporal character of the modification – such as, whether it is fleeting or temporary, transitory, transitional or a permanent alteration to the character of the place, site or area; and/or

(iv) any existing influences or pressures on the dynamic ecological and geophysical processes contributing to the presence and patterns of natural elements, such that these may change and the natural elements and/or patterns may become threatened over time.

(c) Social values: the place, site or area has meaning for a particular community or communities, including:

(i) sentimental: the natural character of a place, site or area has a strong or special association with a particular community; and/or

(ii) recognition: the place, site or area is held in high public esteem for its natural character value, or its contribution to the sense of identity of a particular community.

30. The definition suggested by Fish and Game includes many of the features of the two national policy statements.

31. Having considered the information available to me, I propose some slight amendments to the original relief sought. This definition would ensure consistency with Policy 13(2), the NPSFM and Policy 3 of the RPS, and that "Natural Character" can be readily understood and applied when interpreting policy and assessing the effects of activities.

The natural character of the coastal environment (including the coastal marine area), rivers, lakes and wetlands may include such attributes and characteristics as:

- a) Natural elements, processes and patterns;
- b) 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;
- c) Natural processes include chemical, geophysical, biophysical, geological, geomorphological and morphological processes;
- d) Ecological aspects, including the relative dominance of indigenous flora and fauna and the presence of culturally significant species;
- e) The colour and clarity of the water;
- f) Natural landforms and features, such as beaches, dunes, wetlands, and rivers;
- g) The nature and extent of modifications to a place, site or area;
- h) Places that are wild and scenic;
- i) A range of natural character from pristine to modified;
- j) Experiential attributes, including sounds and smells, and their context and setting; and
- k) 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.

~~**Natural processes:** Dynamic natural, physical and ecological relationships and events that are characteristically natural in their occurrence and effects, that act to shape the natural environment, its landforms and features, such as beaches, dunes, wetlands, and rivers; and including processes of: wave~~

~~formation, breaking and dissipation; swash run-up; nearshore currents; sediment transport, erosion and deposition, flooding, river meandering, aggradation and mass movement.~~

32. The proposed definition refers to natural processes. The concept would be subsumed under “Natural Character”. Natural processes are an integral aspect of natural character. Yet natural processes are separated out from natural character in both the objectives and the policies of the Plan. Below I set out why I consider that this de-coupling has implications for the effective implementation of the plan on natural character, and the ability of the Council to achieve its objectives
33. An alternative approach to addressing Fish and Game’s relief involves amending Policy P25 to include reference to the matters outlined in the definition. This is discussed in more detail in paragraphs 47 – 61 below.

Objectives

34. Fish and Game sought a number of amendments to Objectives in section 3.4 of the pNRP, specifically to O17, O19 and O22. The submission suggests alternative wording for the objectives, and also specifically requests:

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.

35. Central to Fish and Game’s consideration of suitable objectives to protect and preserve natural character is the introduction of the Habitat Quality Index (referred to in the submission as a Natural Character Index). The introduction of HQI values into the Table 3.4 pNRP would require commensurate changes to

policies and rules in Chapter 5.5 of the pNRP, Wetlands and Beds of Rivers and Lakes. The provisions in this chapter will be discussed in Hearing Stream 5, at which further planning evidence will be provided which will relate to this evidence, and provide further support for Fish and Game's requested amendments on the issue of natural character.

36. For this hearing Professor Death's technical evidence establishes the principles of the HQI tool, and I present an opinion that HQI values should be referred to in the Objectives of the pNRP as a means of providing the Council with a practical, efficient and effective means to meet its natural character objectives and obligations under s6(a) of the RMA.
37. The scientific principle that underlies the HQI tool is that to be healthy, biological communities in streams and rivers require not only suitable water quantity and quality, but also suitable habitat for those organisms to live in. As observed by Professor Death in his evidence, providing for habitat is "often forgotten in river management even though there is a considerable body of evidence that the ecological health and sustainability of freshwater ecosystems is dependent on the appropriate levels of habitat quality" (Professor Death, paragraph 3.1).
38. As explained by Professor Death, the health of habitat for ecological communities can be affected by geomorphological changes, such as the "shape, width and depth of the river channel, the diversity of substrate, mean substrate size, percentage of deposited sediment, number and size of pools, riffles and runs, amount of wood and overhanging vegetation among other things" (Professor Death, paragraph 3.2). Activities involving in-stream river works, such as flood control and management activities, the development of structures located within the beds of rivers and lakes, including bridges, culverts, water intake and discharge pipes and hydroelectricity structures, and activities such as gravel extraction can adversely affect the natural character of rivers and lakes

and their margins, and decreases of the available habitat and/or its quality for aquatic plants and animals.

39. Professor Death draws on evidence that indicates that the loss of natural character in freshwater environments as a result of in-stream works has occurred in the Wellington region:

Engineering of many rivers in the Wellington Region has resulted in a loss of floodplain habitat for many riparian organisms and removal of the connection between the river and floodplain that is critical for many ecological functions (Tockner et al., 2010; Gorski et al., 2013b; Reckendorfer et al., 2013; Death, Fuller & Macklin, 2015). Flood flows that once dissipated across broad floodplains are now confined within the channel. This, together with channel narrowing exacerbates increased flow energy and increases sediment transport, contributing to further habitat reduction (Professor Death, paragraph 8.3).

40. Professor Death, in collaboration with Greater Wellington flood management staff, has developed the Habitat Quality Index to quantify habitat change. It is described as “quick and simple to apply and provides a robust and quantified measure of habitat change” (Professor Death’s evidence, paragraph 7.7), and can be utilised in two ways:

The degree of habitat change from a ‘natural’ condition can be assessed using the Habitat Quality Index (oHQI). Therefore, the oHQI is an easy and effective tool for assessing habitat condition in State of the Environment monitoring and assessment.

The potential change of habitat from instream works such as flood control and urbanisation can also be assessed using the Habitat Quality Index (eHQI). This expresses the percentage change before and after an activity of a range of geomorphological characteristics important as habitat for aquatic animals. The

median for these ratios yields the eHQI (Professor Death, paragraphs 3.4 and 3.5).

41. Professor Death's evidence also demonstrates how the HQI can be used as a means of informing and improving the development of engineering practices that can achieve both effective flood management and avoid any consequential habitat loss:

The HQI also provides a mechanism for developing flood management practices more reflective of natural processes to improve both flood management and biodiversity conservation (Evans et al., 2004; Sear & Arnell, 2006; Evans et al., 2008). HQI values for proposed alternative flood management options can be measured and the one with the least reduction in HQI used (Professor Death, paragraph 8.5).

42. A compelling aspect of the HQI mechanism is that it is can be reliably repeated, as described by Gary Williams in a 2013 report on the use of HQI for monitoring of the Western River's flood management schemes:

The NCI has been produced, along with other baseline data and studies, to provide a basis for monitoring the condition of the scheme reaches of the three rivers and as a guide to river management. The index is a proxy for the environmental condition and health of the waterways, with its repeatability allowing trend monitoring and an indication of changes in condition. Significant changes in the index would then trigger investigations into what has given rise to the changes. This NCI is based on readily determined physical features using an easily repeated data base, of aerial photography and Lidar imagery surveying.²

43. Professor Death has worked with Fish and Game to determine appropriate HQI (NCI) values for each of the River Classes. Fish and Game request that these HQI

² Gary Williams, Report on the Natural Character of the Rivers and an Assessment of Natural Character for Scheme Monitoring, GWRC, February 2013, p.19.

(NCI) values are inserted as a new column into Table 3.4 of the pNRP. The amended table is included in Appendix 2 of this evidence. The purpose of the values in the Table is to maintain habitat quality / natural character and “the concomitant adverse effects of this on river ecological health” (Professor Death, paragraph 7.8). The Table would provide a quantifiable means and methodology for ensuring that natural character is maintained at a HQI (NCI) of between 1 and 0.7 depending on the river. In this way, I consider that the values act as a freshwater quality standard against which consents can be assessed and monitored, and the effectiveness of any activities involving the restoration or rehabilitation of natural character can be measured. In addition, State of the Environment or plan implementation effectiveness monitoring can be undertaken over the life of the Plan.

Inclusion of New Method

[Submission point s308/139, S42A report – Topic: Natural Form and Function, page 34 of 45, Appendix 1]

44. I support Fish and Game’s request that a new method be included into the pNRP. I recommend the following wording be included:

Method M10a: Natural Character

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.

45. Such an approach will build on the work already accomplished by Council scientists in collaboration with Professor Death and others in developing and applying the HQI mechanism, and better ensure that the natural character objectives are achieved at the catchment-wide level and in respect of individual projects and works that may affect the natural character of rivers, wetlands and lakes and their margins.
46. I consider that directing the Council to assess how the natural character provisions of the pNRP and Table 3.4 natural character narrative and numerical freshwater objectives are being met is consistent with the Council's monitoring and reporting functions. Deliberately associating the programme with State of the Environment reporting will ensure the findings of the research and progress towards achieving objectives is transparent and publically available.

Objective 17 Natural Character and O19 Natural Processes

[Submission points s308/018 and s308/019, S42A report – Topic: Natural Form and Function paras 118-179]

Policies P25 and P26

[Submission points s308/054, FS89/070 and FS89/071, S42A report – Topic: Natural Form and Function pages 34 and 40 of Appendix 1]

47. In response to the relief sought by Fish and Game, Ms Legarth makes the following observations:
- Combining Objectives O17 and O19 would remove the distinction in the proposed plan for managing adverse effects on natural character, and managing activities that may interfere with the natural functioning of natural physical and biological processes; to the extent reasonably practicable (paragraph 154);
 - Objective O17 should not be deleted as it gives effect to NZCPS Policy 13 that manages natural character (paragraph 155);

- The request by Fish and Game to combine the matters dealt with by O17 (natural character) and O19 (natural processes) is not inconsistent with the approach in higher order planning documents, but results in an objective that is more complex than the majority of objectives in the pNRP (paragraph 156);
- O17, O19 and O22 should not be combined, however amendments to Policy P25 should be considered to specifically address natural processes associated with freshwater.

48. I agree with Ms Legarth that deleting O17 would result in an inconsistency between the pNRP and Policy 13 of the NZCPS. However, I consider the relief sought by Fish and Game would provide substitute objectives that are consistent with the NZCPS, a point I understand Ms Legarth to agree with.³

49. I welcome Mr Legarth's recommended amendment to O19 to delete the reference to 'minimise' and to bolster what is meant by 'natural processes'. Following Ms Legarth's recommended amendments, natural processes are to be 'retained'. In my view, 'retain' can have the same meaning as 'preserve', bringing the outcomes for natural processes closer to those for natural character in O17. However, I consider it would be far more efficient to ensure that what is meant by 'natural character' in the pNRP includes natural processes, and provisions be streamlined to preserve and protect natural character accordingly.

50. I note that Ms Legarth does not propose any amendments to P26, which refers to the minimisation of effects on natural processes. I consider this would lead to a disconnect between the outcomes sought in O19 (as revised by Ms Legarth) and the actions specified in P26 to achieve those outcomes.

51. Policy P26, the policy designed to explicitly address natural processes, relies on the definition of the term in the Interpretation section of the Plan, but requires

³ At [156] of her s42A report.

only that “use and development will be managed to *minimise* effects on the integrity and functioning of natural processes” (my emphasis). Because natural processes are part of natural character, the minimisation of effects on natural processes is inconsistent with the achievement of O17, and inconsistent with the direction set by s6(a) of the RMA to preserve natural character in the coastal environment and lakes, rivers and wetlands and their margins and protect them from inappropriate subdivision, use and development.

52. Furthermore, the direction to minimise means that P26 is also subject to P4, Minimising adverse effects. P4 has been the subject of expert witness conferencing (28 June 2017). The reliance of the implementation of P26 on P4 would lead to outcomes that are not consistent with the direction in s6(a) of the RMA. I also consider that individual policies should stand on their own without reliance on other policies.

53. Ms Legarth’s preferred solution is to recommend changes to Policy P25 to:

include specific matters associated with the natural character of freshwater would provide a more specific reference to freshwater natural character values and assist with the assessment of consent applications and the implementation of Objective O17.⁴

54. I welcome that the amendments partially re-establish the link between natural processes and natural character in the freshwater environment. However:

- they do not overcome the problem inherent in the current relationship between O17, which seeks to preserve and protect natural character, O19 (as notified) and P26, which seeks only to minimise the interference of use and development on natural processes.

⁴ At [161] of her s42A report

- the introduction of clause (f) to P25, as recommended by Ms Legarth introduces the need to consider some aspects of natural processes, but not all.

55. Professor Death's evidence indicates to me that Ms Legarth's analysis does not take proper account of the dependency between protection of natural character overall and the protection of natural processes. As Professor Death explains:

It will be impossible to manage for natural character without also considering the natural processes that result in that character. If you are only 'minimising' the effects of development on natural processes, then you are not going to be able to protect natural character overall (paragraph 8.6).

56. I propose the following, which I consider to be more effective and efficient than the current suite of natural character provisions:

- Amalgamate Objectives O17 and O19;
- Amalgamate and policies P25 and P26; and
- Include a definition of "Natural Character" or, if a definition is not provided, include the full list of natural character aspects in Policy 25.

57. The preferred relief and alternative relief are set out in Appendices 1 and 2.

58. This relief would also contribute to addressing concerns about the coherency and connectedness of the objectives overall, which have been summarised in my response to Mr Gerard Willis' report, *Review of the objectives of the Proposed Natural Resources Plan: A report for Greater Wellington*,

59. However, if the Panel is minded to retain O17 and O19 and P25 and 26, I recommend that the provisions relating to natural processes be bolstered so as to ensure it is afforded the same level of protection as natural character.

Objective 31 Outstanding Water Bodies

[Submission points s308/147, S42A report – Topic: Natural Form and Function page 35 of 45, Appendix 1]

60. Ms Legarth rejects Fish and Game’s submission s308/147 to amend the O31 and associated policies and rules to ensure that outstanding waterbodies are identified based on a full assessment of their values.
61. I note that O31 is to be discussed as part of Hearing Stream 5, at which Fish and Game will present technical and planning evidence in support of the relief sought.
62. As a general point, I consider that the segregation of the discussion of natural form and function from a discussion about associated values, such as outstanding water bodies, mana whenua values, and indigenous biodiversity values, prevents a necessary holistic consideration of these matters as they pertain to the overall management of our freshwater resources. It is likely that any discussion of matters set down for Hearing Stream 5 will need to refer back to, and possibly influence the outcome of, matters discussed as part of this and earlier hearing streams.