

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of **PROPOSED CHANGE 1** to the **GREATER WELLINGTON NATURAL RESOURCES PLAN**

SUBMISSION ON BEHALF OF THE WELLINGTON FISH AND GAME COUNCIL

HEARING STREAM 1 – OVERARCHING MATTERS

1. INTRODUCTION

- 1.1 These submissions are filed on behalf of Wellington Fish and Game Council, a submitter on the Greater Wellington Regional Council Proposed Plan Change 1 to the Natural Resources Plan. Wellington Fish and Game filed submissions on a number of provisions proposed for inclusion in Plan Change 1, which we understand will be considered in later hearing streams.
- 1.2 Wellington Fish and Game is the statutory body established under the Conservation Act and responsible for the management of sports fish and game bird resources in the Wellington Fish and Game region. These statutory functions include the maintenance and enhancement of the habitat of sports fish and game; the rivers, lakes, streams, and wetlands within which sports fish, game birds, and many indigenous species thrive.
- 1.3 In discharging its statutory obligations, Wellington Fish and Game represents the interests of over 8000 license holders in the region. These recreational and food gathering pursuits are part of New Zealand’s historic and ongoing cultural heritage.
- 1.4 My full name is Ami Coughlan.

- 1.5 I have the following qualifications:
- (a) Bachelor of Environmental Science from Massey University.
 - (b) Master of Science, Ecology with Distinction from Massey University.
- 1.6 I am employed by the Wellington Fish and Game Council as a Resource Officer. I have held that role since December 2018. As a Resource Officer, I am responsible for:
- (a) Managing the Fish and Game's response to policy, planning, and environmental issues affecting sports fish and/or gamebird values.
 - (b) Co-ordinating with the regional Fish and Game Council regarding regional planning and consenting processes relating to resource projects and to the National Fish and Game Council as required.
 - (c) Monitoring RMA resource consent applications, preparing submissions in response to planning processes, and advocating for habitat management and access in relation to sports fish and game birds.

Purpose and scope of submission

- 1.7 The purpose of my evidence is to provide some context for amendments sought by Fish and Game to Proposed Change 1 and included in this Hearing Stream 1 as addressed in the Section 42A report and set out in the allocation of Provisions to Hearing Streams documentation.
- 1.8 These are as follow:
- (a) General comments – waterbodies: Target attribute states;
 - (b) General comments – waterbodies: minimising cumulative impacts of water takes;
 - (c) General comments – waterbodies: Mis-named soft bottomed streams;
 - (d) Provision 5.4.4 - General conditions beds of lakes and rivers;
 - (e) Provision 5.4.8 Rule R1515A – Ongoing diversion of a river – permitted activity;
 - (f) Method M40 – Fish passage action plan for Whaitua te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua;

- (g) Policy WH. P28 – Achieving reductions in sediment discharges from plantation forestry; and
- (h) Objective O19 – Biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies.

2. **WELLINGTON FISH AND GAME SUBMISSION POINTS**

- 2.1 The provisions allocated here under general comments were covered in our original submission, and will not be revisited here. We appreciate the opportunity to comment on these aspects of the Natural Resources Plan.

Provision 5.4.4

- 2.2 Wellington Fish and Game support retaining the protections for trout spawning habitat in clause (f).

Provision 5.4.8 Rule R151A

- 2.3 This provision is to allow existing permanent diversions of rivers over 10 years old to be allowed as a permitted activity. The rationale given in the Section 32 report is that after 10 years the affected waterbody has stabilised, and the requirement for re-consenting of these structures is expensive and can cause stress to the applicants. The report states approximately 75 structures region wide would be captured by this new provision and gives a handful of examples.
- 2.4 Wellington Fish and Game appreciates the stress, time requirements, and financial burden of consent and consenting activity. It is also understood that many of these structures will no longer be able to be removed, as in the examples of stream diversions from greenfield developments on which housing now stands – hopefully safe from any flooding of old waterways.
- 2.5 However, there are several main concerns with the addition of this provision. The first is that these structures and diversions have not been named, and without full transparency it is difficult to understand the implications of allowing these works to become permitted into perpetuity.
- 2.6 The second concern is that by accepting an impacted waterway as becoming 'naturalised', in some cases, what is being accepted is a level of degradation. The National Policy Statement for Freshwater Management (2020) asks that freshwater should be managed to ensure that the health and well-being of degraded waterbodies and freshwater ecosystems is improved (Policy 5) – it does not ask that degraded waterbodies are accepted and permitted. A risk

assessment of the impacts of each of these diversions to ensure they are not contributing to aquatic degradation.

- 2.7 Further, despite the financial and time constraints, re-consenting provides an opportunity to check that diversions and structures remain fit for purpose. Issues such as fish passage barriers can occur over time, and without a system of regular checks for consenting purposes these are unlikely to be detected in a timely manner. As mentioned in the report, adverse effects are difficult to attribute to diversions after a short period of time: this does not mean those effects are not occurring, however, and without even a cursory 35-year re-consent application these are even less likely to be detected.
- 2.8 This suggested provision also risks grandfathering historic structures and disincentivising appropriate amendments or regular incentives to adopt better options. Globally water diversions and dams are being removed, rivers are being given room to move, wetlands are being reconstructed and restored, and science is continuing to gain wider understanding of how to adjust urban design in water sensitive ways that benefit the entire catchment. Likewise, there is a much-needed acceptance of Mātauranga and other ways of looking at the world we live in, and locking in old schemes is likely to add delays in these new means of thinking and doing which could assist with restoring our freshwater ecosystems.
- 2.9 Wellington Fish and Game therefore asks that water diversions are retained as discretionary activities, particularly in the absence of a list of affected diversions and any critical analysis of their ongoing impacts, in order to not see needed innovation and forward thinking that will enable freshwater restoration stifled. Even if Te Mana o te Wai is removed from the Natural Resources Plan, the principles under the RMA and NSP-FM of looking after the environment are still justified, as is the expectation of steady stepwise improvements.

Policy WH. P28

- 2.10 Wellington Fish and Game supports methods to reduce sediment discharges from plantation forestry.

Method M40

- 2.11 Wellington Fish and Game supports a fish passage action plan for these Whaitua. As statutory managers of sports fish, with decades of experience in habitat and species management and experience as environmental advocates, Fish and Game needs to in collaboration where there are discussions around where sports fish should be allowed access.

- 2.12 Any species interaction management actions should be undertaken as a collaborative, science-based event with iwi, relevant council bodies, the Department of Conservation, and Fish and Game councils.

Objective O19

- 2.13 Objective O19 asks that biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies and coastal marine area are safeguarded such that:
- 2.14 Wellington Fish and Games submission point here is specific to clause (c): Restoration of aquatic ecosystem health and mahinga kai is encouraged.
- 2.15 The NPS-FM (2020) Policy 5 does ask that degraded ecosystems are improved, and while O19 clause c) does not directly speak only to degraded ecosystems, encouraging restoration may not be directive enough to achieve desired environmental outcomes.
- 2.16 As such relief was suggested: c) aquatic ecosystem health and mahinga kai values are maintained where in good health and restored where degraded.
- 2.17 If improve where degraded is preferable, this would also provide stronger direction.

Ami Coughlan

17 October 2024