

Discussion of HS2 Rebuttal Evidence and Appendix 2

During my submission at Hearing Stream 2 of Plan Change 1 to the Natural Resources Plan (NRP PC1), I was directed to the rebuttal evidence of Ms O'Callahan, and the further recommended amendments to provisions in Appendix 2. I wish to thank the Hearing Panel for this opportunity, the Greater Wellington staff for facilitating the Hearing Streams, and Ms O'Callahan for her work on the mammoth task of PC1.

I was specifically directed to provide comment on Method 36a, WH. O10, and natural form and character. I have also made mention of any of the notes I spoke to at the hearing which were addressed in the rebuttal evidence or further amendments, in terms of how the evidence aligns with the relief requested by Wellington Fish and Game. If not commented on below, my notes, verbal submission at Hearing Stream 2, and the original submission on the NRP PC1 remain as stated.

Method 36a – new method

This appears to be a very solid method to put in place the measured interim timeframes requested to work towards ecosystem health, and its inclusion in the NRP PC1 is strongly supported by Wellington Fish and Game.

My sole concern is clause b: 2036 feels like too long to wait, particularly if some timeframes in PC1 are asking for 2030 (for example P. O7 and WH. O10). It would be preferable to have this deadline set at 2030 to give 10 years before the 2040 timeframes stated for several target attribute states, which would allow for two 5-year monitoring reports. Wellington Fish and Game strongly support monitoring at a minimum of 5 yearly intervals, which would give reasonable monitoring feedback to suggest if mitigations are effective, if they need to be made more stringent, or if they should be relaxed.

WH. O10

Wellington Fish and Game supports the additions to Objective WH. O10 and find that inclusion of timeframes here alleviate much of our concern around the lack of measurable interim goals to achieve ecosystem health by 2100.

Natural form and character

The inclusion of natural form and character into objectives WH. O1, WH. O2, WH. O9, P. O2, and P. O6 is appreciated. Wellington Fish and Game also appreciate and support the intention in each of these objectives to improve where stated environmental processes and qualities are degraded. I am unsure as to why the statement to improve erosion processes has been removed from WH. O2: if the catchments of Whaitua Te Whanganui-a-Tara are erosion free, then this makes sense, however if land use and land use changes create erosion and sediment inputs into freshwater at any scale then this should continue to be addressed, and the removal of this would not be supported.

Objective P. O1

The original submission for the NRP PC1 and for HS2 requested that P. O1 be more aspirational and include interim timeframes to progress restoration (where required) towards the goal of wai ora – ecosystem health by 2100. The updated Objective P. O1 appears to be more aspirational, particularly

when read alongside P. O2 which provides for a progressive implementation plan. Wellington Fish and Game also support the objective of water being used for social and economic use benefits, provided that the health and wellbeing of waterbodies, freshwater ecosystems, and coastal waters is not compromised, as this is in alignment with national legislation and Te Mana o te Wai, which Fish and Game continue to strongly support.

Objectives P. O2 and WH. O2

Our requested relief for P. O2 and WH. O2 (inclusion of valued introduced species) has not been addressed in the rebuttal or further amendments documents, and as such, still stands. For additional clarity and supporting my statements during HS2, the valued introduced species in scope for Fish and Game are those sports fish and game birds which are defined in the Wildlife Act 1953 and by an Order in Council under the Conservation Act 1983.

Objective WH. O3

The addition of health and wellbeing of ecosystems and habitats being maintained or improved where deteriorated is appreciated. This captures a great deal of the spirit of protection of coastal and coastal area habitats. I am unsure why clause b has been removed, as reduction in contaminants entering the coastal area is an important facet of ecosystem restoration. I remain of my previous opinion that clause h, while important for preventing further deterioration, does not move towards the stated "improved where deteriorated" objective.

Objective P. O7

The discussion in HS2 around this objective was to seek improvement rather than an entrenched 'holding pattern' of no further degradation. The addition of interim targets here addresses that concern, and Wellington Fish and Game support this addition.

Conclusion

I wish again to express my gratitude for the opportunity to provide comment here, and to reinforce the support of Wellington Fish and Game for all objectives, policies, rules, and methods which effectively support the environment and freshwater and coastal ecosystem health. In addition, and in agreement with the GWRC HS2 rebuttal to legal submissions on behalf of Greater Wellington (28 March 2025), where arguments of achievability are conflated with affordability, it is vital to put the health and resilience of our environment and freshwater ecosystems as a priority, even if this ultimately means other projects may have to be paused and re-prioritized.

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