View Submitter Details

Submitter No.	S213
Submitter Name	Pareraho Forest Trust
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
S213.1	Earthworks	Support	Retain definition	We support the more comprehensive definition for our Whaitua to capture all activities that involve land disturbance and create risk of significant sediment loss to water. We have observed sedimentation of our streams from activities such as side-casting of earth during farm road maintenance and the creation of farm tracks for the purpose of installing fencing.
S213.2	6.16 Freshwater Action Plan programme	Support	Retain	We look forward to being engaged as a local catchment community group, and appreciate the method specifying that FAPs may be prepared with discretionary attribute states or environmental outcomes identified in partnership with mana whenua or with the community.
S213.3	Method 39: Freshwater Action Plan for Nationally Threatened freshwater species within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	That wording is added to draw a link between these two plan types (M39 and M40) and the site specific FAPs in order that community catchment groups can collectively contribute to action planning for threatened species and fish passage throughout the Whaitua and as it pertains to their catchment of interest.	Our catchment is home to nationally threatened freshwater species, and contains fish passage barriers.
S213.4	Method M41: Identifying and responding to degradation in freshwater bodies within Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.	Amend	We propose such reporting happen more frequently so degradation can be responded to more quickly. We suggest degradation is continually identified, and published at least once every ~~five~~ **three** years.	We agree with transparent and regular reporting of degradation, in both good and poor quality waterbodies. But it needs to be more frequent in order to enable quicker intervention.
S213.5	Method M43: Supporting the health of urban waterbodies.	Support	Retain	
S213.6	Method M44: Supporting the health of rural waterbodies.	Support	Retain	
S213.7	Method M45: Funding of wastewater and stormwater network upgrades	Support	Retain	It is clear that financial cost of the task ahead exceeds what can realistically be raised through rating local residents. Central Govenrment support is needed.
S213.8	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	Retain	Strongly support progressive improvement to health of all freshwater within the Whaitua. Our streams are good quality on many attributes, including E.coli most of the time, but not on all attributes and not at all times, so there is plenty of room for improvement to raise te mana o te wai, including its safety for recreation, mahinga kai, taonga species and ecological health.
S213.9	Objective WH.O2: The health and wellbeing of Te Whanganui-a-Tara's groundwater, rivers and natural wetlands and their margins are on a trajectory of measurable improvement towards wai ora.	Support	Retain	Eg. Our stream are fortunate to still have cobble beds, despite sediment input levels being higher than natural level. But they still have too much deposited sediment in places and lowering sediment input from erosion-prone headwaters and earthworks will improve health and wellbeing.
S213.10	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	Retain	Our catchment is not coastal, but contribute to coastal health and wellbeing of Te Whanganui a Tara. We would hope that the freshwater objectives would result in improved parameters for the harbour and estuaries, rather than just maintained state.
S213.11	Objective WH.O4: The extent, condition, and connectivity of habitats of nationally threatened freshwater species are increased and the long-term population numbers of these species and the area over which they occur are increased, improving their threat classification status.	Support	Retain	Strongly support, and we hope our catchment quality can be improved to be home to more diverse, abundant and healthy populations of threated species, inlcuding our lamprey.
S213.12	Objective WH.O5: By 2040 the health and wellbeing of the Parangarahu Lakes and associated natural wetlands are on a trajectory of improvement towards wai ora.	Support	Retain	We recognise mana whenua and the signficance of the rare and special lakes and natural wetlands in our Whaitua. Given the severe loss of natural wetlands, we emphasise the criticality of protecting remaining natural wetlands, and also the creation, construction or restoration of wetlands where they can function well or may have once been.
S213.13	Objective WH.O8: Primary contact sites within Te Awa Kairangi/Hutt River, Pakuratahi River, Akatarawa River and Wainuiomata River are suitable for primary contact.	Amend	That Speedys Stream at Taniwha Pool (accessed near the intersection of Major Drive and SH2) is added to Map 85 as a primary contact site. We also propose that similar small stream sites of high recreational contact in the Whaitua are identified and also added.	We have multiple popular swimming sites in our catchment, one of which would have multiple swimmers in the water on every fine day throughout summer. Small stream sites are often more accessible, safe and pleasant for younger children and for associated activities like picnicing and walking. We propose adding our most downsteam site to WH.O8. Wellington Water monitors E.coli near this site so a baseline numeric is available. The site is currently subject to signposts warning against swimming due to recent wastewater pipe leaks, and as a result we have had to remove the site from community swimming activities for the time-being. The TAS should be set to a state that improves on the current state, through resolving the regular sewage overflows into the stream and makes the site consistently suitable for contact recreation as is valued and expected by the local community.
S213.14	Objective WH.O9: Water quality, habitats, water quantity and ecological processes of rivers are maintained or improved.	Amend	Increase FCH parameter for Korokoro part-FMU to a TAS of B.	We question why Fish Community Health TAS is only C, when the Korokoro, Speedys and Dry Creek catchments are all protected as Greater Wellington Key Native Ecosystems (in part) for their fish diversity values, and these catchments will be important sites for improving threatened species diversity, condition and abundance. We propose a B TAS for the FCH parameter.
S213.15	Policy WH.P1: Improvement of aquatic ecosystem health.	Support	Retain	
S213.16	Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives.	Support	Retain	
S213.17	Policy WH.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Support	Retain	
S213.18	Policy WH.P4: Achievement of the visual clarity target attribute states.	Support	Retain	Noting that lowering the Te Awakairangi lower mainsteam load of 100kt/year by 24% will require action across all tributary catchments including our part-FMU.
S213.19	Policy WH.P8: Avoiding discharges of specific products and waste.	Amend	Add a subpoint requiring Greater Wellington to undertake public education and highlight the impact of disposing of polluting liquids in stormwater.	Noting that in our catchment we periodically observe illegal dischrages of substance like paint and cement wash into the stormwater network that ends up in our stream. We propose Greater Wellington action plans include public education and promotion of the importance of appropriate disposal of hazardous liquids.
S213.20	Policy WH.P13: Managing stormwater network discharges through a Stormwater Management Strategy.	Amend	add Schedule F sites to (f)	Support, with addition that (f) should also include prioritising Schedule F sites. Most of Schedule F waterbodies do not include stormwater infrastructure as they are either rural or in natural forest. But some do, and stormwater discharges impact on indigenous fish populations including threatened species. The lack of stormwater reduction, removal and treatment of stormwater discharges from surburban areas in our catchment, including recent and in-construction greenfield development, needs to be addressed as part of improving stream ecological health for indigenous species and achieving objectives of this Plan Change.
S213.21	Policy WH.P17: General wastewater policy to achieve target attribute states and coastal objectives.	Support		Noting that our stream is subject to far too regular dry and wet weather wastewater discharges from network pipes in both Belmont and Kelson. Also noting we support Kaitiaki monitoring teams and offer our assistance with monitoring.
S213.22	8.2.4 Rural land use and earthworks	Support	Retain Policies 21 to 26	The headwaters of our catchment are currently in pastoral farming and include alot of highest erosion prone land, aerial top-dressing of nutrients, and stock with access to streams, seeps and small wetland areas. We are committed to supporting and paying for reduction in pollution from suburban landuse and infrastructure, despite the challenges; and we think it is important and fair that pollution from rural landuse also contributes, supported by Greater Wellington, through the actions outlined in these policies.
S213.23	Policy WH.P27: Promoting stream shading.	Amend	Remove the qualifier so shading is promoted everywhere.	Support, but promoting progressive shading of streams everywhere as part and parcel of riparian retirement, planting, bank and streambed protection, not just where nutrient management is insuffciient to achieve periphyton TASs. Shading is important for multiple values and attributes: e.g. temperature, fish habitat, sediment reduction.
S213.24	Policy WH.P30: Discharge standard for earthworks.	Amend	add wording to require that monitoring results are published and community catchment groups are informed where to view them.	Our stream is regularly affected by greenfield development earthworks in Kelson that decrease visual clarity downstream more than the standard proposed and through the winter period. Stronger and more transparent regulation of sediment discharges is needed. re P30 The discharge standard is sorely needed, as is the winter shutdown of works. Because sediment pollution is highly visibile, it is of high interest to community catchment groups. We propose that (c) is amended to require WRC to publish monitoring results and advise communuy catchment groups of where the results can be found.
S213.25	Rule WH.R27: Farming activities on 20 hectares or more of land – permitted activity.	Amend	Move Korokoro Stream into the 30 December 2025 tranche.	We question why FEPs for Korokoro Stream part FMU is not required by 2025. The number of farms over 20 hectares are few, perhaps just the one large farm within Belmont Regional Park, which has an impact on downstream water quality. The rationale for a 2026 due date is unclear, but could be see as Greater Wellington giving itself more time to prepare a FEP whilst requiring private farms to move faster.
S213.26	Rule WH.R36: Take and use of water exceeding minimum flows or core allocation – prohibited activity.	Support	Retain	We urge GWRC to move quickly to set water allocation rules for TWT. Te Awakairangi's low flow in summer is placing huge pressure on ecological and community values.
S213.27	Schedule F1: Rivers and lakes with significant indigenous ecosystems.	Support	Retain	We can attest to the presence of lamprey in Speedys Stream, having recorded one recently. We also have an eDNA sample from the stream.
S213.28	C. Freshwater Action Plans in Whaitua Te Whanganui-a-Tara	Amend	Retain Schedule, but add deposited fine sediment and fish community health as required attributes for Korokoro part-FMU. Specify a mandatory process for community invovement as envisaged in the Policy. And add **(e) describe the community groups, their offered contributions and any ways councils propose to support them to work collectively toward FAP objectives.**	Support attributes for Korokoro Stream partFMU with addition of deposited fine sediment and fish community health. It is unclear why these are excluded given their importance to ecological health to support the diversity, condition and abundance of indigenous fish species including threatened species such as lamprey Strongly support 2(a) but Schedule must specify a mandatory process for community involvement and add (e) outline the community groups, their offered contributions and ways for councils to support them to work collectively onward the FAP objectives.
S213.29	Map 79: Part freshwater management units and target attribute state sites (rivers) – Te Whanganui-a-Tara.	Support	Retain	We strongly support the inclusion of Speedys Stream and Dry Creek in the Korokoro part-FMU
S213.30	Map 89: Unplanned greenfield areas – Hutt City Council.	Support	Retain	We strongly support the inclusion of a map clearly showing existing urban and planned greenfield sites. Part of our catchment (Kilmister) is often promoted for greenfield development without consideration of environmental effects. It is crucial that any public or private plan change to enable such a development must also propose to change this Plan in order that environmental effects can be fully assessed.
S213.31	Map 93: Highest and high erosion risk land (Pasture) – Te Whanganui-a-Tara.	Support	Retain	Strongly support this mapping and the policies it supports. Much of the head of our catchment is highest or high erosion prone, and we can attest to this on the ground. The mapping underscores why this is important for freshwater outcomes.

Raw submission documents

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

Document name	File	Description	Upload date
No data			