



TE RŪNANGA O TOA RANGATIRA

Ā UPANE KA UPANE WHITI TE RA

15 December 2023

Greater Wellington Regional Council

Natural Resources Plan

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Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region

Preamble

This is a submission of Te Rūnanga o Toa Rangatira (Te Rūnanga) on Proposed Plan Change 1 (the plan change) to the Natural Resources Plan (NRP) for the Wellington Region.

The contact person for this submission is Rawiri Faulkner (see address for service details below).

Te Rūnanga wishes to be heard at the hearing in support of this submission.

We are open to considering presenting a joint case at the hearing with others who make a similar submission.

Te Rūnanga has no gain or advantage in trade competition through this submission.

In providing this submission to Greater Wellington Regional Council (GWRC), Te Rūnanga agrees to having read and understood the terms and process outlined in the Plan Change 1 Information Statement.

Submission

Te Rūnanga is the mandated iwi authority for Ngāti Toa Rangatira (Ngāti Toa). We have the responsibility for protecting and enhancing the mana of Ngāti Toa across the various political, economic, social and environmental spheres.

In relation to Te Ao Tūroa, the objective of Ngāti Toa is to nurture a resilient environment to sustain future generations through reclaimed connection and mātauranga to natural resources, empowering kaitiaki who are leaders and co-managers of our natural environment, our commitment to environmental sustainability and our ability to adapt to the impacts of climate change.

Te Awarua o Porirua and Te Whanganui a Tara

The Rūnanga commends GWRC for completing work to give effect to Te Awarua o Porirua and Te Whanganui a Tara Whaitua recommendations and the National Policy Statement for Freshwater Management 2020 (NPS-FM).

Te Awarua o Porirua and Te Whanganui a Tara are at the heart of the heritage and values of Ngāti Toa Rangatira. The importance of the harbours are recognised in legislation under the Ngāti Toa Rangatira Claims Settlement Act 2014.

The health of Te Awarua o Porirua and Te Whanganui a Tara has been negatively impacted by human activity over many years, including reclamation of land and discharges of contaminants, to the point where environmental values have been severely degraded. Unacceptable levels of sediment and other contaminants continue to flow into the harbours, resulting in poor water quality and chronic environmental effects.

Restoring the health of Te Awarua o Porirua and Te Whanganui a Tara are key priorities for Te Rūnanga o Toa Rangatira. We are also involved with the Kapiti Whaitua and following the finalisation of this process, we understand another plan change will be introduced to reflect the outcomes of the Kapiti Whaitua.

Towards wai ora of Te Awarua o Porirua and Te Whanganui a Tara

Te Rūnanga provided input into the draft plan change as recognised in the Section 32 report. This input included matters relating to Māori rights and interests to freshwater; Te Mana o Te Wai under the NPS-FM; mahinga kai as a highly significant value; and timeframes for E.coli target attribute states and the enterococci coastal water objectives.

Te Rūnanga supports the proposed objectives and policies in the plan change which sets new direction to restore our rivers, lakes, natural wetlands for contact recreation and Māori customary use.

Of critical importance is the new planning framework for Te Whanganui a Tara and Te Awarua o Porirua. These frameworks implement the NPS-FM, the Ngāti Toa Statement on the Te Awarua o Porirua Whaitua and Te Mahere Wai for the Te Whanganui a Tara Whaitua. For the first time in the planning system, the cultural health of Te Awarua o Porirua and Te Whanganui a Tara is of central importance and there is a pathway towards wai ora involving respect for taonga, restoration of mauri, ecological health, mahinga kai and kaimoana.

We acknowledge the level of ambition to achieve measurable improvement towards wai ora as outlined in the objectives, policies and rules relating to Te Whanganui a Tara and Te Awarua o Porirua. These provisions set new targets and standards for coastal water, nationally threatened freshwater species, groundwater, water quality, habitats, water quantity, and ecological processes of rivers. We are committed to working with the local authorities and Wellington Water Ltd to make these targets achievable especially in relation to stormwater and wastewater discharge consents.

Unplanned greenfield development

The plan change aims to improve aquatic ecosystem health by managing activities to achieve target attribute states and coastal water objectives. For this purpose, the plan change proposes to prohibit unplanned greenfield development relating to the impact of stormwater contaminants (Policy EH.P2(a)). Further, stormwater discharges from unplanned greenfield development is to be avoided where the discharge will enter a

surface water body or coastal water, including through an existing local authority stormwater network (Policy P.P15).

To implement these policies, it is proposed to prohibit stormwater discharges from new unplanned greenfield development when:

The use of land and the associated discharge of stormwater from impervious surfaces from unplanned greenfield development direct into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or proposed stormwater network, is a prohibited activity

The rule also notes that any unplanned greenfield development proposals will require a plan change to the relevant maps outlined in the NRP (Map s86, 87, 88 or 89). This would mean that the plan change process should be considered concurrent with any associated change to the relevant district plan, to support integrated planning and assessment.

We consider the intention of these provisions is to restrict urban development that is ad hoc and uncoordinated to minimise water quality impacts, lack of stormwater infrastructure and other environmental effects.

Te Rūnanga supports a dedicated planning approach to development in the Wellington Region. Urban sprawl should be avoided when it results in poor environmental outcomes. However, there appears to be a need to clarify the provisions relating to 'unplanned greenfield development' and the type of activities that would be captured by this rule and the appropriate rule category.

Under the Ngāti Toa Rangatira Deed of Settlement Act 2014, land has been returned or acquired by Ngāti Toa Rangatira under the Right of First Refusal or other processes. These lands may involve historical legacy zones or activities which have been inherited from previous owners or land uses, such as former education and corrections facilities. While new development will aim to achieve high standards of wastewater and stormwater disposal in terms of Water Sensitive Urban Design systems, there could be unanticipated challenges relating to existing (historical) infrastructure, buildings and related additions or alterations that may trigger the unplanned greenfield development rule.

Similar issues may also exist for areas whereby resource consents may have been granted for activities in unplanned greenfield development areas but the zoning has yet to reflect existing activity. For example, there could be upgrades to facilities in rural areas that could trigger the unplanned greenfield development rule. These upgrades may not justify the expense and time of a private plan change process.

Further, there needs a strong alignment between the provisions of the district plans and NRP when it comes signalling land that may potentially become part of future urban development areas. For example, the maps outlined on pages 86-89 may quickly become 'out of date' due to district plan reviews. Further, the rule would require two plan change processes (an update to the relevant maps on pages 86-89 of the NRP and the district plan zoning).

