

**DRAFT**

## **Submission to Plan Change 1 to the Greater Wellington Natural Resources Plan, from Pat van Berkel, Upper Hutt 14 Dec 2023**

I note that this Plan Change is to implement requirements of national government's National Policy Statement for Freshwater and many of the recommendations from the Whaitua Implementation Programme (WIP) from Te Whanganui-a-Tara Whaitua Committee and Te Mahere Wai from Mana Whenua.

I was a member of the Te Whanganui-a-Tara Whaitua committee for its 3 year existence 2018 to Sept 2021. I am a member of the Te Whanganui-a-Tara Reference Group. I am a member of Friends of the Hutt River and a member of Te Hononga Ki Te Upoko - Wellington Catchments Collective.

As nature thrives, so I thrive.

It has been a massive undertaking to amend the Natural Resources Plan in line with the recommendations of the Whaitua committees. I congratulate and thank Greater Wellington staff and councillors for their leadership, insights and good intentions for Te Taiao and the people.

I would like to appear in person at the hearing of submissions.

The Whaitua made some far reaching recommendations in two senses – they fix the water quality problems of our pipe networks; and they allow significant time in which to undertake this massive task. The intention behind allowing time was that the water agency (with the responsibility for maintenance) would define staged targets to fixing the pipes. Therefore I seek a requirement in the NRP that water quality improvement (through pipe network repairs, etc) be staged and that the timeline be published and updated each year.

I support the TAS (Target Attribute State) for e-coli to reach high quality by 2040, not 2060. 2040 is enough time to get the loans, expand the workforce, and carry out the task.

I recognise that the four territorial authorities need to be behind the Whaitua recommendations and this Plan Change 1. It is vital that the water issues facing our cities be resolved. I ask that each of the cities publicly state how they are going to implement the Whaitua recommendations and the limits in PC1.

There is no mention of the precious 300ha Mangaroa Peatland. This is the biggest peatland in the Wellington Region. This peatland needs to be included in PC1.

## Comments relating to specific parts of Plan Change 1

### 2.2 Definitions

1. There is no definition of “*primary contact*” (although there is one for *primary contact sites*). Please **add** one.
2. The definition of *Primary contact sites* refers to Map 85. A search for “Map 85” (using the PDF Search function) does not locate “Map 85”. Please ensure that all maps are text searchable.
3. The definition of *Primary contact sites* refers to Map 85. The definition should **include** a text list of the sites so they are searchable in the document.
4. Map 85 omits the heavily used swimming hole (primary contact site) “Whakatikei River at Hutt Confluence”. This site is completely separate from “Hutt River at Poets Park”. Please **add** the site “Whakatikei River at Hutt Confluence” **to Map 85 (and to a text list of the definition of Primary contact sites.)**
5. Regarding the definition of “unplanned greenfield development”:  
I **oppose** the term “unplanned greenfield development”. This term has a presumption that it applies to land that is in some way developable as a greenfield development but just happens to be currently unplanned. But this is not true.  
I **support** including the note: *Unplanned greenfield areas are those areas that do not have an urban or future urban zone at the time of Plan Change 1 notification, 30th October 2023.* This includes the “Southern Growth Area” of Upper Hutt which is currently zoned General Rural.  
I **support** Map 88 excluding the “Southern Growth Area” from the Upper Hutt planned urban area.

### General Rules

6. **Section 5.1.13** (between R36 and R37) Discharge of chemicals, does not have a Rule number and probably one should be **added**.

### Objectives

7. **WH.08 and Table 8.3 Primary contact sites**  
I **oppose** Objective WH.08 because it allows that by 2040 e-coli may not be improved (in the stated rivers).  
I also **oppose** the objective because it omits a measure of benthic cyanobacteria or cyanobacteria blooms.  
I also **oppose** the objective because there isn’t any measure of swimmable days which is an easy-to-understand measure for the public.  
I request to **change** “suitable for primary contact *by ensuring that by 2040:*” to “suitable for primary contact *and ensure that by 2040:*”
8. I seek the **addition** of a Parameter in Table 8.3, namely “Swimmable Days”. It efficiently encompasses all water quality reasons that a river may not be swimmable (eg, e-coli and benthic cyanobacteria) and is easily understood by the public.

9. I seek the **addition** of a Parameter in Table 8.3 which is a measure of benthic cyanobacteria or cyanobacteria blooms. This is a key measure for Te Awa Kairangi as the toxic algae in this river has killed over 12 dogs in the last 20 years. It can seriously affect children and adults.
10. Note WH.08 (b) “*there is low risk of health effects from exposure to benthic cyanobacteria*” does not cover the risk to dogs, as “primary contact” refers to humans. Over a year, there are probably more people visiting the river with dogs than without dogs. This objective should **cover** the risk to dogs.
11. **WH.09 and Table 8.4: Target attribute states for rivers**  
I support in part, this objective but it is incomplete. I seek the **addition** of a Parameter in Table 8.4 which is “Swimmable Days” (as for WH.08). This is an easy-to-understand parameter that the public understands. It encompasses all water quality reasons that a river may not be swimmable, eg, e-coli and benthic cyanobacteria. (It could exclude days of high flow and immediate following.)
12. **WH.P10 Stormwater discharges and WH.P11: Discharges of contaminants**  
These clauses refer to “where practicable” or “where avoidance is not practicable” to discharging contaminants. This could lead to a developer claiming that a stormwater treatment system is not practicable (thus preferring offsetting) but it may be best for the environment that the activity be avoided altogether rather than offset.  
**Add** WH.P10 (c) (vi): Where a stormwater treatment system is judged not practicable consider not undertaking the activity.
13. **WH.P10 Stormwater discharges**  
There is no mention of permeable surfaces (as the NRP definition for *water sensitive urban design* does not specifically mention permeable surfaces and rainwater tanks).  
**Add** a note to WH.P10 (b): Water sensitive urban design includes permeable surfaces and rainwater tanks.
14. **WH.P14 Stormwater discharges from greenfield and brownfield developments and redevelopments**  
Impervious surfaces are assumed and there is no requirement for permeable surfaces.  
**Add** WH.P14 (a) (iii): include permeable surfaces where possible (eg, for minor roads, carparks, footpaths).
15. **WH.P15 Offsetting**  
Offsets may be used as a way of avoiding managing contaminants. Please **add** a note explaining how such avoidance is discouraged.

#### Whaitua Rules

16. **WH.R33 and WH.R34 Take and use of water**  
Recommendation 83 of the Te Whanganui-a-Tara Whaitua Committee, recommends gradually raising the minimum flow of Te Awa Kairangi, Orongorongo and Wainuiomata rivers to 80% of MALF (mean annual low flow) over a 50 year period. At present the minimum flow of Te Awa Kairangi is at 30% of MALF.  
**Add** to these rules the gradual changes in minimum flow that are required between 2021 (when the recommendation was accepted by Greater Wellington) and 2071, to meet recommendation 83.