

Summary of Submissions received by Greater Wellington Regional Council for WGN130264 – Te Awa Kairangi / Hutt River

General Position of Submission	Total
Oppose	6
Support	2
Conditional	4
Total submissions received	12

Sub ID	Name of submitter / Organisation	Support / Neutral / Oppose application	Wish To Be Heard?	Summary of submission
1	Transpower New Zealand Limited	Conditional	Yes	The submitter has stated they are neutral to the application subject to their recommended conditions of consent being imposed. If the conditions or conditions of like effect are not imposed then Transpower would be opposed to these applications. The submitter seeks to ensure that there are no adverse effects on the ongoing operation, maintenance and upgrading of its existing transmission lines where these cross various rivers and river corridors within the application area, and that any river management measures around the assets are carried out safely. The submitter suggests that suitable conditions should be imposed to ensure that the lines and towers remain accessible for maintenance, operation and upgrading; safe clearance distances between the ground and conductor (wires) are maintained; excavations do not destabilise towers and poles; and that mobile plant/machinery and people must always maintain minimum safe separation distances from the lines.
2	GBC Winstone (A division of Fletcher Concrete & Infrastructure Ltd)	Support	No	Supports the application as ongoing river management activities for flood protection, erosion control and public amenity purposes in the corridor of the Hutt River are critical to the ongoing operation of the Petone Sand Plant.
3	Director-General of Conservation	Oppose in part	Yes	The submitter recognises the importance of maintenance of the Council's flood protection infrastructure, the requirement to replace infrastructure, and supports Councils' ongoing riparian planting program to reduce the risk of floodwaters damaging property. However, in relation to other activities proposed such as sand and gravel extraction, constructing new rock rip-rap and recontouring gravel beds of rivers, the submitter considers that the applications lodged have insufficient information to determine the potential effects of the proposed activities on the values contained within the rivers and their margins. The submitter opposes the application on the basis that: it does not adequately identify the actual and potential adverse effects of gravel removal from the active river beds, and including from flowing water, on their significant indigenous biodiversity values; it fails to protect and restore the wetland, freshwater, estuarine and braided river bird values and fail to avoid any more than minor adverse effects on the significant indigenous biodiversity values contained within the river and margins; and it does not consider other methods for managing flood flows on the flood plain.

4	KiwiRail Holdings Limited	Conditional	Yes	Supports the application. The submitter seeks a condition to notify KiwiRail's Wellington Metro Network Services Manager at least 10 working days prior to any physical works commencing within 200m of a KiwiRail bridge, to ensure that the integrity of KiwiRail assets are not physically undermined, as well as ensuring that appropriate safety measures are in place to protect both the contractor undertaking the works and the rail network.
5	Caleb Royal	Oppose	Yes	Opposes the application. Notes that each of these associated consents have overlaying material which compromises the ability of each consent to get a free and fair hearing, and that the consents contravene the RMA, PNRP, NPSFW, MOP and other planning and legislative documents.
6	Ngā Hapu o Ōtaki	Oppose	Yes	<p>Hei tautoko te kaupapa o nga whanau o te upoko o te ika a Maui. Kia puawai nga whakaaro o te tino rangatiratanga me te kawanatanga. Kia puta mai te rereketanga o nga whakaaro o nga iwi o te rohe nei, me te whakaaro kotahi hoki.</p> <p>To support the families of Wellington (Te Upoko o Te Ika a Māui). For their ideas of self-determination (tino rangatiratanga) and authority/rule (kawanatanga) to come to fruition. That the tribes of this region will be able to work through their differences, and become united.</p>
7	Powerco Limited	Conditional	Yes	The submitter is neutral as to whether or not the resource consents are approved. However they have recommended conditions so the COP or consents incorporate the outcomes they seek. The submitter seeks to ensure that, if they are approved, the proposed works do not result in adverse effects on its existing gas assets unless there is an agreed process by which effects and assets can be appropriately managed. The effects of concern include: physical damage to assets; disruption of gas supply to customers; exposure or undermining of underground gas assets; level changes that result in too little or too much coverage over underground assets; restrictions on access to gas assets for maintenance purposes; and constraints on future network connections.
8	Hutt Valley Angling Club Inc	Support	Yes	Supports the move away from a pragmatic engineering approach to flood control work, to one informed by science before engineering. The submitter sees good monitoring and research as the way forward in helping to mitigate the consequences of flood control on the intrinsic values of the overall river ecosystem. The submitter seeks specific changes to the Code of Practice to provide for the intrinsic values of the watercourses, monitoring of MCI and the hyporheic zone, an acknowledgment that the hyporheic zone and the safety of recreational users may be compromised by river management activities, and the inclusion of other opportunities for environmental enhancement. The submitter seeks changes to the Event Monitoring of habitat mapping at impact and reference sites to include the hyporheic zone, so that any changes to the hyporheic zone as a consequence of river works can be recorded.
9	Taranaki Whānui ki Te Upoko o Te Ika	Oppose	Yes	The submitter states that Te Awakairangi/Hutt River is a waterbody with cultural, spiritual, historical and traditional significance to Taranaki Whānui and they consider the proposed activities to have the potential to produce significant adverse effects on this waterbody and surrounding environment. The submitter opposes the application as: it does not recognise their statutory acknowledgement; it is inconsistent with the Memorandum of Partnership between Taranaki Whānui and GWRC; it does not promote the sustainable management of resources; it does not achieve the purpose and principles of the RMA; it does not safeguard the life-supporting capacity of water; it does not avoid, remedy, or mitigate the adverse effects of the application on the environment; the consideration of alternatives has been inadequate; it is contrary to the National Policy Statement on Freshwater Management 2014; and it is contrary to or inconsistent with relevant regional and district policy statements and plans. The submitter specifically comments on the single approach that has been developed at a regional level and therefore does not allow for due consideration on how it will affect different awa in different ways across the rohe. The submitter is concerned that the proposed activities lack input from

				them in terms of the methodology adopted, and subsequently the effects on mana whenua and cultural values will not be articulated or understood. This includes effects pertaining to water quality, aquatic ecology, birds, recreation and neighbouring community, which have a broader effect on their relationship to the waterbodies.
10	Ngāti Toa Rangātira	Oppose	Yes	The submitter states that Te Awa Kairangi River is a waterbody of high significance to Ngāti Toa and they consider the proposed activities to have the potential to produce significant adverse effects on this waterbody and surrounding environment. The submitter opposes the application as: it does not promote the sustainable management of resources; it does not achieve the purpose and principles of the RMA; it does not safeguard the life-supporting capacity of water; it does not avoid, remedy, or mitigate the adverse effects of the application on the environment; the consideration of alternatives has been inadequate; it is contrary to the National Policy Statement on Freshwater Management 2010; and it is contrary to or inconsistent with relevant regional and district policy statements and plans. The submitter is concerned with the complacency of the goals and aspirations for the future management of Te Awa Kairangi, and comments that the priority should be the gradual restoration and enhancement of the natural environment and the protection of cultural values involving the river. The submitter notes that a 35-year term will reduce the effectiveness of mana whenua involvement in River Protection, and suggests that a shorter term will allow for the ongoing assessment of the proposed methods and to make changes as needed. The submitter comments on the lack of alternative options that will have a less than minor effect on native fish species. The submitter is concerned that the proposed activities lacks input from them in terms of the methodology adopted, and subsequently the effects on mana whenua and cultural values will not be articulated or understood. This includes effects pertaining to water quality, aquatic ecology, birds, recreation and neighbouring community, which have a broader effect on their relationship to the waterbodies.
11	Wellington Flyfishers Club Inc	Conditional	No	The submitter is broadly supportive of the need for flood control activities to continue on this river and understands the level of complexity involved in balancing and managing rivers with multiple and often competing values. However, the submitter notes that the river systems hold important trout species which are essential to the submitter's activities. The submitter's primary concern is the health of the entire ecosystem not only for trout but for native fish as well and the ability of the public to use the waterways for recreational purposes. The submitter seeks conditions in relation to the use of a single consent that governs all water use activities and takes account of recreational users; the formation of a river advisory committee to improve relationships between river users and the Council; regular reporting of all proposed works and the opportunity to comment prior to the works commencing; flexibility to provide for emergency works; a review every 10 years; limits on the extent of river disturbance; and time restrictions to provide for fish spawning and migration.
12	Wellington Fish and Game Council	Oppose	Yes	The submitter recognises the need for flood control activities to continue on this river; however the primary concern is the health of the entire ecosystem, from source to sea. The submitter has concerns that trout are often seen only for recreational characteristics, rather than as an indicator species for the health of the overall river. The submitter has some specific recommendations to mitigate ecological issues such as sedimentation and loss of natural character. The submitter suggests the use of a single wrap-around consent for up to 35 years that governs the multitude of subsidiary land-use, water permit, discharge permit, and coastal permits for individual rivers in order to enable work planning, on-site consultation, and river-specific environmental bottom-lines and precautionary periods within the overall context of adaptive management. They would be supportive of a river advisory committee to improve relationships between river users and the Council, as well as use experience and ideas of iwi, anglers and others in practical river design. The submitter has a keen interest in the works that come within a one metre band from the instream channel and works that involve the loss of habitat associated with loss of bankside or instream vegetation that overhangs

				or is immediately adjacent to the instream channel. The submitter also seeks specific instream works restrictions (maximum length of disturbance) and time restrictions to provide for migrating fish.
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