

Summary of Submissions received by Greater Wellington Regional Council for WGN140054 – Otaki River

General Position of Submission	Total
Oppose	6
Support	6
Conditional	4
Total submissions received	16

Sub ID	Name of submitter / Organisation	Support / Neutral / Oppose application	Wish To Be Heard?	Summary of submission
1	Michael Tracey	Support	No	Supports the application and comments that the river needs material taken out in the lower reaches. Suggests that care needs to be taken to protect the fish habitat.
2	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.
3	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 Otaki River are critical to the ongoing operation of the Otaki Quarry.
4	Po Chu Yeung	Support	No	Supports the application as she believes it is necessary to solve the flooding problem.
5	Dr Stephen Kenneth Wilfred Lang	Conditional	Yes	Opposes the application as it stands, however will support it with minor changes. The submitter asks that monitoring of river bed heights of Rangiuuru and Ngatoko Streams be included in the Environmental Monitoring Plan so that dredging can recommence as required. States that water quality of Rangiuuru and Ngatoko Streams could be improved by keeping stock out of the streams. Asks how allowing duck shooting is consistent with the estuary being a significant habitat for indigenous birds and a Key Native Ecosystem. States that if an 'adaptive' approach is adopted, the EMP will need adequate funding and all research needs independent and rigorous peer review. Notes that research funding needs to be included to monitor effects on foreshore and seabed to ensure these effects remain minor.
6	Kapiti Fly Fishing Club Inc	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.
7	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 Council's 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 lacks information on the cumulative effects of sediment supply to the open Kapiti coastline and its stability; it fails to protect and restore the wetland, freshwater, estuarine and braided river bird values and fails 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.
8	Lutz Farming Company Limited	Support	Yes	Supports the application. Expects all flood protection work to be carried out in the same manner as in the past. Seeks that work procedures that have proven to be effective and have demonstrated to deliver positive results be allowed to continue. Expects to be able to manage and maintain the Waimanu Stream and drains on the submitter's property in a responsible way within constraints imposed by Fonterra. Acknowledges the importance of urgent flood relief work being carried out in the Otaki River corridor and wants this to be part of the consent. Acknowledges the Otaki Flood Management Plan is currently under review and is a living document. States that minimum river flows are adequate and do not need to be reduced. Notes that it is important that all work undertaken gives priority to the protection of human life and assets associated within the community. Acknowledges this consent document is a living document and would like to be consulted should any change be required.
9	Friends of the Otaki River Inc	Support	Not Specified	Supports the application. The submitter strongly supports the continued financial assistance to groups such as FOTOR as programmed as part of the Otaki Environmental Strategy and employment of a contractor to assist in the maintenance of riverside and estuary plantings.
10	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.

11	Caleb Royal	Oppose	Yes	Opposes the application. Notes that each of the 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.
12	Ngā Hapu o Ōtaki	Oppose	Yes	<p>The submitter states that the Otaki River, Waimanu, Rangiuuru, Ngatoko, Katihiku and Pahiko Streams are waterbodies of high significance to NHoO 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 is inconsistent with purpose of the RMA; it does not recognise or provide for the relationship of NHoO and their culture and traditions with their traditional lands, waters, sites, wahi tapu, and other taonga; it does not recognise or provide for the protection of customary rights; the effects on the aquatic environment are not avoided, remedied, or mitigated through the proposed activities; it is inconsistent with the objectives of the National Policy Statement for Freshwater Management 2014; it is contrary to or inconsistent with relevant regional and district policy statements and plans; it is inconsistent with the Memorandum of Partnership between NHoO and GWRC; and it fails to incorporate the Proposed Ngati Raukawa Otaki River and Catchment Iwi Management Plan 2000. The submitter states that GWRC has gained financially through the sale of a resource they do not own and believes that the benefits from the sale of gravel, a taonga from the Ōtaki River should benefit NHoO. Evidence suggests that gravel extraction and its sale has been of benefit to the industry and not to the river. The submitter notes that there is no evidence in the application of how mahinga kai will be safeguarded, how Māori customary use will be provided for, or the mauri of the affected waterways enhanced. The submitter does not believe the applicant has considered a holistic and long-term approach to the management of watercourses in this application, and is concerned the river works are generally large scale and of a short-term nature. The submitter opposes the 35-year term as they believe that such a lengthy term will prevent innovation and improvement both in service delivery to the community, and locks out NHoO from managing their Awa Tupuna for another generation. The submitter notes they have been precluded from participating in decision making processes, including the proposed Maori Consultative Group, and therefore are opposed to the adaptive management approach suggested. The submitter notes concerns in relation to maintaining the design channel and the effects of that on riparian vegetation and habitat, the effects of gravel extraction and bed recontouring on the hyperheos and the lack of monitoring data. The submitter notes that there is no commitment in the consent application or conditions to develop the Kaitiaki Monitoring Strategy into a plan for implementation. The submitter is also concerned with all effects on waterbodies which can have a broader impact on their relationship to the waterbodies. The submitter believes the application undermines kaupapa Maori, particularly Rangatiratanga, Kaitiakitanga, Kotahitanga, and Ukaipotanga, and therefore doesn't reflect a partnered approach to management of flood protection or provide for the Integrated Catchment Management Agreement (2016) between NHoO and the Catchment Management Group.</p>
13	Margaret Niven	Oppose	Not Specified	Opposes the application and is very concerned about a number of issues that the submitter considers will have a serious and significant adverse impact on their family farm and private lives. Issues include takeover of private land, over-regulation of farming activity and land stewardship, animal welfare and safety of people, length of the consent period, and consultation on GWRC Otaki River Proposals. The submitter seeks that the extent of the proposed river corridor, proposed application area, and proposed buffer zone need to be limited to the Crown land adjoining the submitter's boundary and not extend onto private land. The submitter also strongly opposes the proposal in the application that GWRC could allow the public access to the proposed river corridor. The submitter suggests a length of 5 years for the resource consent rather than the 35 years requested, to ensure an acceptable standard of flood management and erosion control is developed and maintained.

14	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.
15	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.
16	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.