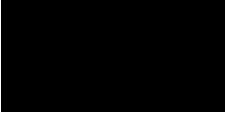


# Submission on Proposed Change 1 to the Natural Resources Plan for the Wellington Region

Craig Innes



15 December 2023

## Summary

I wish to make the following submission:

1. The plan change document is extremely difficult to read, inaccessible and the maps associated with the document are unclear and do not accurately reflect the contents of the written document.
2. I am unclear whether the stream that is located at the rear of my parent's property is listed in the schedule. I am therefore unclear what wildlife has been identified for this stream. The stream passes through Hair Street and is subject to multiple water control features associated with the urban development. It also is covered for a part of its length from Hair Street to Gibbs Crescent. I want GWRC to official note and record that there is no natural passage for fish on this stream.
3. I object to the description of Wainuiomata-iti Stream (Wainuiomata Stream). I believe that this waterway needs to be described in light of a proper survey of the wildlife currently found in the stream.
4. I object to the stock number limitation indicated as this is not appropriate for a rural area.
5. I object to the fact that not enough account has been taken of the effects of pest species on publicly owned land. I want the GWRC, DOC and HCC to undertake pest control on public land and to accurately factor in the effects of wild animals in its planning.
6. I want an urgent investigation into the extent of the wetland at the end of Moores Valley Road.
7. I want an urgent investigation into the unconsented cleanfill or landfill located at 1044 Coast Road. I want any restrictions on earthworks and water contamination to be fairly applied and for the Hutt District Council and Greater Wellington Regional Council to not selectively enforce compliance with the rules.

I wish to provide a verbal submission in addition to this written submission.

### **1. The plan change document is extremely difficult to read, inaccessible and the maps associated with the document are unclear.**

Although the notification for the change advised that hard copies of the proposal were available this proved not to be the case.

The map system that is linked to the plan document is not fit for purpose. Streams that had been individually listed in the schedule of the document were merged together in the GIS data. I have many years of experience with the use of GIS data, but I found that I was unable to identify the streams associated with my parent's property. Many streams in the schedule were identified by coordinates. This was not an appropriate level of identification. Each stream should have been shown on a map and properly identified with reference to features that the reader could identify.

The interface with the map system was clunky and not fit for purpose. When I tried to view the various data sets the map reset and I was forced to adjust the view to my area of interest.

The wording of the planning document was very difficult to read. I do not believe that this document is fit for purpose. The connections between the policies to the geographic areas that the policies are supposed to apply to are entirely inadequate. This is one of the worst documents that I have ever read in terms of its supposed intention to guide the activities of the public. I have extensive personal experience with Te Ao Maori and also twenty years of experience with working in the field of Treaty research. Even so, I found the use of Maori words within the document confusing and unclear.

**2. I am unclear whether the stream that is located at the rear of my parent's property is listed in the schedule. I am therefore unclear what wildlife has been identified for this stream. The stream passes through Hair Street and is subject to multiple water control features associated with the urban development. It also is covered for a part of its length from Hair Street to Gibbs Crescent. I want GWRC to official note and record that there is no natural passage for fish on this stream.**

In 2021 my parents received an abatement notice from Paul Duffin who stated that he held a warrant from both Hutt City Council and Greater Wellington Regional Council. This abatement notice falsely stated that a hanging culvert had been constructed on this stream. The notice also falsely stated that the stream was a tributary to Black Creek. It is in fact a tributary to the Wainuiomata River. It also falsely assumed that had a hanging culvert been constructed, that this would be a barrier to the passage of fish. The stream in question has multiple Council constructed water control features down stream and is covered between near the end of Hair Street and Gibbs Crescent.

I have spoken to landowners and contractors who have received or been threatened with enforcement action. I am alarmed by the lack of understanding of enforcement officers about the features that they are making decisions on. Officers have incorrectly pursued people for damage that had occurred in unconnected waterways. Most concerning of all, GWRC has turned a completely blind eye to damage to some waterways when it suits it. The Hutt City Council dumped over 100,000 tons of soil, rubbish and concrete in the floodplain of the Wainuiomata River. Allowing the silt run off from Transmission Gully was obscene when compared to the petty prosecutions of farmers and contractors for minor clouding of streams.

**3. I object to the description of Wainuiomata-iti Stream (Wainuiomata Stream). We believe that this waterway needs to be described in light of a proper survey of the wildlife found in the river.**

This waterway appears to be badly affected by bacterial life. Very few living creatures appear to be surviving in this stream. While some of the listed species may have once lived in the stream, eels are the only species that appear to survive and even these are far less common than previously observed. When I was a child the stream was a habitat for fish and lamprey. Now I would not let a dog drink from it.

**4. I object to the stock number limitation indicated as this is not appropriate for a rural area.** The limitations on stock do not seem to take adequate account of the differences in the effect on waterways of different stock types.

**5. I object to the fact that not enough account has been taken of the effects of pest species on publicly owned land. We want the GWRC, DOC and HCC to undertake pest control on public land.**

I am concerned about the lack of pest control on land owned by Hutt City Council (and HCC land managed by GWRC), Greater Wellington Regional Council and the Department of Conservation. A number of landowners have complained to me that their property is being adversely affected by pest animals coming in from neighbouring publicly owned land. This even includes owners of suburban sections. The understory of the bush has been destroyed by deer.

Private landowners should not be restricted because of the effects of pest animals on poorly managed public land. I believe that the wild animals on public land need to be factored into any restrictions imposed on private landowners. Private landowners should not be made to compensate for the damage caused ultimately by local and central government.

**6. I want an urgent investigation into the extent of the wetland at the end of Moores Valley Road.**

I understand from a former real estate agent who inspected the property that extensive parts of flat area of Lot 60 DP 354855 is wetland. I have checked the wetlands identified by GWRC and found the extent of this identification is woeful. I know of many clearly identifiable wetlands that are not shown in the GWRC GIS data.

**7. I want an urgent investigation into the unconsented cleanfill or landfill located at 1044 Coast Road. I want any restrictions on earthworks and water contamination to be fairly applied and for the Hutt District Council and Greater Wellington Regional Council to not selectively enforce compliance with the rules.**

The rules around earthworks and water contamination are meaningless and perverse if they are not applied equitably and fairly. I first raised concerns about the apparent illegal use of the property at 1044 Coast Road as a cleanfill/landfill in 2022. Since then, I have had continuing reports of large trucks full of soil and concrete visiting the site. These trucks are passing Wainuiomata Primary during school hours and have been seen passing at drop-off/pickup times. I have followed some of the trucks myself and seen material falling from vehicles.

Back in 2022 I reported to GWRC that the dry bed of the meandering Wainuiomata River was being filled with material. I know that GWRC and HCC have received complaints from myself and others. I want the GWRC to assess the property and to do so legally. When I requested the information held by GWRC on the property under LGOIMA I was alarmed to see that the officer flew a drone on the property without the consent of the owner. A comparison of the LiDAR data and data legally obtained by GWRC will quickly establish the extent of the activity undertaken.

**Concluding remarks**

I have found that communication from the Greater Wellington Regional Council on the Proposed Change 1 to the Natural Resources Plan for the Wellington Region has been extremely poor. I have found that very few of the affected people know about the proposal.

I object to the short period being allocated for submissions. I also object to the end date for submissions being so close to Christmas and coinciding with the submissions date for the Hutt City Council Draft District Plan.