

GUARDIANS OF PAUATAHANUI INLET

PO Box 57034
Mana
Porirua

24 April 2011

Submission on NZTA change to Regional Freshwater Plan

Summary

The New Zealand Transport Agency (NZTA) asked for a plan change to the Regional Freshwater Plan. We did not support the proposed change and presented our reasons to the EPA. Other organisations, such as Forest & Bird Central Office, have fully supported our stand, while some have partly supported it.

Here's the text of our submission.

Guardians of Pāuatahanui Inlet (GOPI) is a community organisation formed in 1991 to promote and protect the ecological, recreational and cultural values of the Pāuatahanui Inlet.

We oppose the proposed plan change because it will reduce protection for important streams, which feed into one of the most important estuaries in the lower North Island. We do not accept offsetting as a viable approach for such an ecologically significant area. We do not accept that the proposed changes are consistent with the objectives of the plan - rather we consider that the proposal would undermine the integrity of the plan.

Rather than reducing protection for the streams in the Pāuatahanui area, any plan change should be providing increased protection.

NZTA have made clear in their application for a plan change that the Transmission Gully Project would be likely to cause more than minor effects on the relevant streams.

There are good reasons for the plan providing a high level of protection for these streams. This is the case even with Ration Stream, which has been subject to greater past damage. Collectively the streams have regionally significant value in themselves, and also flow into Pāuatahanui inlet, which is one of the most important estuarine areas in the region. It is recognised as an area of significant conservation value in the Regional Coastal Plan. It is important that these streams are restored rather than further degraded, to maintain and restore their natural character and ecological values, and as part of the restoration of the inlet.

Major progress has been made in the restoration of the inlet through the combined efforts of the Councils, local communities, local groups such as GOPI, Pāuatahanui Inlet Community Trust (now disbanded) and Forest and Bird. It is vital that this progress is not undermined by projects such as motorway development. In the end, the health of a shallow estuarine inlet such as Pāuatahanui is a product of the health of the streams flowing into it.

Offsetting will not undo the damage that would be done. Offsetting maybe a legitimate notion for projects where the loss of the value being affected is not serious. But offsetting is not a legitimate

approach to effects on unique values. No amount of work in other catchments can possibly offset the damage to this, extremely high value, catchment. No amount of offsetting within the catchment will alter the fact that permanent and irreversible damage will be done to water bodies that should be subject to progressive restoration.

The Wellington Conservation Management Strategy is relevant to this proposal, as it recognises the importance of the Pāuatahanui and Horokiri streams. This is a statutory plan to which regard must be had. NZTA do not appear to have addressed this document in their application.

In summary, we believe that the proposed changes to the plan are contrary to its intent.
