

Submission on the Proposed Lower Hutt District Plan 2025

from Wellington Fish and Game

This is a submission from Wellington Fish and Game Council on the Proposed Lower Hutt District Plan 2025

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Wellington Fish and Game **could not** gain an advantage in trade competition through this submission.

1. Wellington Fish and Game Council (WFGC) submits on the proposed Lower Hutt District Plan 2025.
2. WFGC confirms that it wishes to exercise its right to be heard in relation to this submission.
3. If others make a similar submission, Wellington Fish and Game **will** consider presenting a joint case with them at the hearing.
4. Fish and Game was established under the Conservation Act 1987 as the statutory body responsible for the management of sports fish and gamebird resources in the Wellington Fish and Game region. Several of the gamebird species under WFGC's management are indigenous to New Zealand, and WFGC shares a particular interest in the maintenance of New Zealand's indigenous biodiversity alongside the interests of mana whenua and other New Zealanders.
5. WFGC's statutory management functions include the maintenance and enhancement of the habitat of sports fish and game – the rivers, lakes, streams and wetlands within which sports fish, gamebirds, and many indigenous taonga species thrive.
6. WFGC is tasked by statute to advocate for protection and restoration of these habitats, and for access to rivers, lakes, and wetlands for anglers and hunters.
7. In discharging its statutory responsibilities, WFGC represents the interests of over 8000 license holders (sports fish anglers and game bird hunters) in the region. These recreational pursuits are part of New Zealand's cultural heritage and are woven into the fabric of our society and ethos.

Proposed District Plan Section	Specific section / clause under discussion	WFG submission	Suggested relief
Coastal and riparian margins - definition	Coastal margins and riparian margins are defined in this plan as land within a horizontal distance of 10 metres from the landward boundary of the coastal marine area , the bank of a river or the edge of a lake .	Support	Retain as drafted
NATC-O1	The natural character of coastal margins and riparian margins is preserved and protected from inappropriate subdivision , use and development, and enhanced.	Support	Retain as drafted
NATC-P4	<p>Provide for the use and development of land within coastal margins and riparian margins where:</p> <ol style="list-style-type: none"> 1. The use and development is of a scale, form, and nature that does not detract from the natural character of the coastal margin or riparian margin, or 2. The use and development: <ol style="list-style-type: none"> a. Has a functional need or operational need to be located within the coastal margin or riparian margin and no alternative locations are practicable, and b. Has been designed and located to minimise adverse effects on the natural character of coastal margins and riparian margins. 	Support with amendments.	<p>It is important that access to riparian margins and coastal margins is created and maintained where possible. To this end, it should be made apparent that both clause 1 and 2 are needed to allow for use and development of this land. As written, any coastal or riparian margins can be developed, potentially excluding use by any other party, as long as natural character is perceived to be unimpacted.</p> <p>Suggested relief:</p>

			<p>1. The use and development is of a scale, form, and nature that does not detract from the natural character of the <u>coastal margin</u> or <u>riparian margin</u>, or and</p> <p>The inclusion of the word 'and' at the end of clause 1 would restrict use and development to those which have a functional or operational need to be located in those margins.</p>
NATC-P5	<p>Avoid all other use and development of <u>land</u> within <u>coastal margins</u> and <u>riparian margins</u> not provided for through NATC-P1, NATC-P2, NATC-P3, and NATC-P4, unless:</p> <ol style="list-style-type: none"> 1. The use and development: <ol style="list-style-type: none"> a. Will not have any adverse <u>effects</u> on the natural character and <u>amenity values</u> of the coast, <u>water</u> bodies, and their margins, or 2. The use and development: <ol style="list-style-type: none"> a. Has a <u>functional need</u> or <u>operational need</u> to be located within the <u>coastal margin</u> or <u>riparian margin</u> and no 	Support with amendments.	<p>It is important that access to riparian margins and coastal margins is created and maintained where possible. To this end, it should be made apparent that both clause 1 <u>and</u> 2 are needed to allow for use and development of this land. As written, any coastal or riparian margins can be developed, potentially excluding use by any</p>

	<p>alternative locations are practicable, and</p> <p>b. Has been designed and located to minimise adverse effects on the natural character of coastal margins and riparian margins.</p>		<p>other party, as long as natural character is perceived to be unimpacted.</p> <p>Suggested relief:</p> <ol style="list-style-type: none"> 1. The use and development is of a scale, form, and nature that does not detract from the natural character of the coastal margin or riparian margin, or and <p>The inclusion of the word 'and' at the end of clause 1 would restrict use and development to those which have a functional or operational need to be located in those margins.</p>
NH-O5	<p>Natural systems and features that reduce the susceptibility of people, buildings and infrastructure from damage from natural hazards are created, retained or enhanced.</p>	Strongly support.	<p>WFGC strongly support this objective. Research indicates initiatives such as green urban design, wetlands in river corridors, sponge city concepts etc can be useful for reducing natural hazard impacts, and</p>

			increasing climate resilience.
NH-P3	Maintain and enhance natural systems and features where they will reduce the existing risk posed by natural hazards to people, buildings and infrastructure .	Strongly support.	WFGC strongly support this objective. Research indicates initiatives such as green urban design, wetlands in river corridors, sponge city concepts etc can be useful for reducing natural hazard impacts, and increasing climate resilience.
Objective PA-O1	Public access to and along rivers , lakes , and the coastal marine area is maintained and enhanced.	Strongly support,	WFGC strongly supports any initiative to maintain and enhance public access to waterbodies and coastal marine area.
Objective PA-O2	Public access to and along rivers , lakes , and the coastal marine area does not have a negative impact on existing natural environment values, coastal environment values, historical and cultural values, or public health and safety.	Support.	It is important that public access promotes positive impacts on the natural environment. It is also important that some aspects of recreational use are seen through a reverse sensitivity lens, where newer uses of the resource should not displace a historical and cultural use.
Policy PA-P1	Allow activities within coastal margins and riparian margins where they do not limit or prevent public	Support.	Retain as drafted.

	access to, along, or adjacent to rivers , lakes , and the coastal marine area .		
Policy PA-P2	<p>Maintain and enhance public access to, along, and adjacent to rivers, lakes, and the coastal marine area by:</p> <ol style="list-style-type: none"> 1. Ensuring the design and layout of subdivisions in and along coastal margins and riparian margins provide for public access to and along rivers, lakes, and the coastal marine area, and 2. Requiring the creation of Esplanade Reserves or Esplanade Strips as part of the subdivision of land containing or adjacent to rivers, lakes, and the coastal marine area to retain or enhance public access. 	Strongly support.	Retain as drafted.
Policy PA-P3	<p>Only allow for the restriction of public access to, along, or adjacent to rivers, lakes and the coastal marine area where:</p> <ol style="list-style-type: none"> 1. The restrictions are necessary to: <ol style="list-style-type: none"> a. Protect threatened indigenous species, or b. Protect dunes, estuaries, and other sensitive natural areas or habitats, or c. Protect sites and activities of cultural value to Māori, or d. Protect historic heritage, or e. Protect public health or safety, or f. Provide for temporary activities or special events, or 	Support with amendments.	Where public access to rivers, lakes, and coastal marine areas are restricted or reduced, alternative options and routes should provide like for like access. For example, if previous access allowed for motor vehicles then replacement access should too.

	<ul style="list-style-type: none"> g. Provide for the safe and efficient operation of regionally significant infrastructure, or h. Address other exceptional circumstances sufficient to justify the restriction, and <p>2. Alternative options and routes to maintain access have been considered and are provided where practicable.</p>		
SUB-P8	<p>1. Require the provision of esplanade reserves and esplanade strips for subdivisions adjacent to the coastal marine area, rivers, and lakes to maintain and enhance:</p> <ul style="list-style-type: none"> a. Public access to and along the coastal marine area, rivers, and lakes, b. Ecological, amenity, and recreational values, and c. Natural hazard resilience. <p>2. Only allow for the reduction or waiver of any esplanade reserve or esplanade strip requirements, where it can be demonstrated that:</p> <ul style="list-style-type: none"> a. Safe public access to and along the coastal marine area, rivers, and lakes and recreational use is already possible and can be maintained for the future, b. The ecological values and landscape features of the land adjoining the coastal marine area, river, or lake will not be adversely affected, 	Support.	Retain as drafted.

	<ul style="list-style-type: none"> c. Any scheduled historic heritage places and sites and areas of significance to Māori will not be adversely affected, d. The reduced width of the esplanade reserve or strip is sufficient to manage the risk of adverse effects resulting from natural hazards, taking into account the likely long-term effects of climate change, e. A full-width esplanade reserve or esplanade strip is not required to maintain the natural character and amenity of the coastal environment, and f. A reduced width in certain locations is offset by an increase in width in other locations which would result in a positive public benefit. 		
ASW-P1	Enable activities on the surface of water that have a low impact, including fishing, rafting, and swimming.	Strongly support.	Access to waterbodies for these recreational activities are very important.
ASW-P3	Recognise the benefits of activities in rivers and lakes that manage natural hazard risks and the health of the water body .	Support.	Retain as drafted.
ASW-R1	Non-motorised activities on the surface of water are a permitted activity	Support.	Retain as drafted.
EW-P1	Enable minor earthworks where:	Support with amendments.	Sediment is a primary pollutant of freshwater and the marine environment. While most

	<ol style="list-style-type: none"> 1. The stability and structural integrity of <u>land</u>, <u>infrastructure</u>, and <u>buildings</u> are not compromised, 2. Erosion, <u>dust</u>, and sedimentation <u>effects</u> on <u>land</u> and <u>water</u> bodies are minimised, and 3. <u>Effects</u> on visual amenity are insignificant. 		<p>sediment policies are the domain of regional councils, as district councils enable building, roading, land use changes and subdivision, all of which have accumulative sedimentation impacts, a stronger stance should be taken on avoiding this. Suggested relief for clause 2:</p> <ol style="list-style-type: none"> 2. Erosion, dust, and sedimentation effects on land and water bodies are avoided or minimised, and
EW-P13	<ol style="list-style-type: none"> 3. <u>Earthworks</u> within <u>coastal margins</u> and <u>riparian margins</u> are managed as follows: 	Support.	<p>Retain as drafted. It is noted, however, that this section only speaks to the impacts of earthworks in the immediate margin (coastal or riparian), and does not address indirect impacts from works away from the margins, which via overland flow, groundwater, or drains and gutters, still impacts both the margins and the freshwater itself. While most of this is regional council specific, there is</p>

			still a need to address at an urban and district level the impacts from those works which are enabled at the urban and district level (eg., subdivision).
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Conclusion

Wellington Fish and Game appreciate the opportunity to provide comment on the Proposed Lower Hutt District Plan. Ensuring access to waterbodies for recreational users including sport fish and game bird license holders, and ensuring that any adverse effects on freshwater by development, subdivision, or the use of contaminated land are prevented or mitigated are the priorities here in our submission.

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