Lower Hutt Forest and Bird Protection Society Submission on Proposed Regional Policy Statement

Specific Policies

Policy 11

Strongly agree especially "Where water is assigned more than one management purpose, in a regional plan, water quality, river flow and the water levels shall not be less than the limits established for aquatic ecosystem health."

Policy 16

Strongly agree Add to Policy 16 (i) Maintain fish passage and mitigate the effect of existing fish pass impediments in waterways.

Explanation

Many of NZ indigenous fish need to go to the sea and return from it before they become adult and breed. Fish pass impediments in waterways, such as the sewage pipeline across the Hutt River at Silverstream, the culverts on the seaward side of the Pencarrow Lakes, and the dam in the lower reaches of the Korokoro stream, inhibit this cycle and will eventually remove indigenous fish species from these waterways. This would make a previously valuable waterway one that is not valued.

Policy 22

Strongly support. Particularly (d) (i) and (ii) Indigenous habitat connectivity and seasonal habitat for indigenous species.

The issue we have with this policy is that using the selection criteria, the areas that might be identified and later protected will be few. This means that little will eventually be protected. The criteria essentially are so narrow that while it could protect the best, some connections between them and buffers around them, the majority of indigenous land would end up developed.

We suggest removal of "threatened" from (d) (ii). Indigenous decline is so severe that if action is not taken, all indigenous species will be threatened.

Add (d) (iii) Include the ideas of Policy 46 "Avoiding incremental loss of indigenous ecosystems and habitats" and "Avoiding the cumulative effects of the incremental loss of indigenous ecosystems and habitats."

Policy 23

 ${\it Strongly \ support.}$

Rewrite statement under the policy to be the same as Policy 25 and 27. "Where indigenous ecosystems and habitat with significant biodiversity values have been identified in accordance with policy 22, district and regional plans shall include policies, rules and/or methods that protect indigenous ecosystems and habitat with significant biodiversity values from inappropriate subdivision, use or development." Otherwise Policy 23 is disconnected from the ecosystems and habitats identified in Policy 22.

Policy 24

I think there is something wrong with the wording of this policy. I cannot work out what District and regional schemes do "having determined that the natural feature ... is exceptional ... under one or more of the criteria.

Policy 34

Strongly support

Policy 39

Strongly support

Policy 41

Support

Policy 42

Strong support

Policy 46

Strong support Of all the policies, this is the one that we would support the most. It expresses our view of what should be considered when a development application that affects the natural environment is considered.

Policy 50

Support

Policy 51

Support

Policy 52 Support

Support

New Policy

Perhaps under Objective 16 "Indigenous ecosystems and habitats with significant biodiversity potential are maintained and restored to a healthy functioning state."

Like Policy 64 "Supporting environmental enhancement initiatives"

Support tangata whenua and the community to identify and establish ecological corridors.

Explanation

F&B believe that many of the reserves that we currently have will decline in value because with land use intensification of their surroundings. The surrounding areas will become more hostile whereas currently many of the surrounding areas have patchy bush connections that preserve the biodiversity health of our reserves. We believe that these areas need ecological corridors to connect them together. Phillip Simpson supports this when he wrote "Size tends to influence species and community diversity, stability of interactions, ability to recover from extreme events, potential for regeneration, migration or seasonal movement, protection from plant pest colonisation, impact of edge effects, ability to retain nutrients and others" for DoC 1997.

One of the critical ecological corridors that F&B consider is needed is the length of the Eastern Hutt hills. Much of this is in private hands however a corridor could be established along its length when development takes place. These connections do not have significant biodiversity values in themselves but without them, areas with significant biodiversity that they currently connect will decline because their genetic and geographic diversity will be limited. These areas may well be regenerating shrub lands even gorse at the moment. They are of value because they connect, and are not hostile to, areas of significant indigenous biodiversity.

Overall

Pro Development

The document is pro development. Although it has some very good policies that say that the areas of the natural world that are chosen on certain criteria must be considered before development takes place and there must be policies, rules and methods to protect them, even to enhance them, it is pro development.

Environmental loss on a world scale and locally

Forest and Bird agree with the text on page 44 and 45. From an indigenous ecological point of view, much has been lost and continues to be lost.

A graph from New Scientist 18 October 2008 shows the exponential nature of these losses - including the loss of forest and woodland, the loss of species of animals, birds, insects and plants, and effects on global systems such as on our seas and our atmosphere. These effects are all negative.

We cannot produce graphs for NZ or the Wellington Region however we are sure that they would follow the same trend – trending negative at an increasing rate. The GW Regional Statements should take this into account because they will be the most powerful statements in terms of influencing these trends for the next 15 years.

Forest and Bird does not accept that the current direction, or the speed of these trends is acceptable. We would want to see them slowing and then reversing. To reverse them, even to slow them down, would require a reversal of the thinking in the document. We realize that this may not currently be acceptable to the general population. So while we support and applaud the statements in support of the environment in the document, in that they move in the right direction, we cannot stay silent on our alternative view.

Alternative Regional Statements

We would like to see positive statements about enhancing the natural world, such as;

- No more ecosystems will be destroyed.
- Enhancement techniques will be supported for those indigenous natural areas that are degraded compared to their natural state. This will apply to areas that retain their natural vegetation or a degraded form of it, to all water bodies, to coastal areas and to the sea.
- All forms of indigenous biological life will be protected and where desirable, methods to increase in numbers will be financially supported.
- Some "no fish zones" in rivers, streams and the sea will be established to provide areas where fish are not heavily predated by man and can breed and hopefully return Wellington waters to something like the productive fishery that once existed.
- Fish passage will be restored where indigenous fish have been prevented or inhibited from returning from the sea.
- GW will support the elimination or significant reduction, to the extent that can be achieved, of rats, possums, other non-indigenous predators and non-indigenous herbivores.
- GW will aid the reintroduction of indigenous species especially where such reintroduction can be used to influence the public to have pride in NZ fauna and flora and where such re-introductions can benefit the receiving environment.
- Where possible, these measures will not stop landowners utilizing their land under the zoning regime that applied at the time of purchase but would in most cases prevent rezoning to allow development.
- GW will prosecute landowners who degrade or destroy land that has significant ecological value.
- Greater Wellington will ensure that they have the required expertise and manpower to achieve significant ecological improvement.

Support for Alternative Regional Statements

The state of the world situation demands environmental policies that inhibit development policies.

On page 43, the Document says that healthy ecosystems provide us with life's essentials. They not only provide <u>us</u> with them, they provide the total environment with life's essentials. Global warming, algal blooms, species loss, should tell us that while we are increasing man's affluence, we are damaging the healthy ecosystems that allow the earth to continue and we are doing it at an accelerating rate on a worldwide scale.

We ask that Greater Wellington take the lead in environmental restoration. We offer our support for any initiatives.

Russell Bell Lower Hutt Forest and Bird 3/6/09