

Ā UPANE KA UPANE WHITI TE RA

12 December 2023

Regional Plan Greater Wellington Regional Council 100 Cuba Street, Te Aro PO Box 11646, Wellington 6011

Tēnā koe,

Proposed Variation 1 to Proposed Change 1 to the Regional Policy Statement (RPS)

1. Introduction:

This is a submission from Te Rūnanga o Toa Rangatira (Rūnanga) on Proposed Variation 1 to Proposed Change 1 to the Regional Policy Statement (RPS). Thank you for providing an early discussion opportunity with the Rūnanga planners and your officers.

We would like to acknowledge the positive collaboration and partnership behind the proposed Variation 1 mahi, especially commending on the efforts to reflect and incorporate the documents:

- Te-Awarua-o-Porirua Whaitua Implementation Programme (WIP) Ngāti Toa Rangatira Statement (2019)
- *Te Mahere Wai o Te Kāhui Taiao* a Mana When ua whaitua implementation plan to return mana to our freshwater bodies (2021)

2. <u>Regulatory Context:</u>

The Rūnanga is pleased to see the implementation of *National Policy Statement Freshwater Management 2020 Clause 3.3. Long Term visions for freshwater.* In this clause, it is important to understand – and the emphasis below added for further elaboration – that the clause 3.3.'s policy intent is to direct the steps in the National Objectives Framework (NOF) and 10-year review cycle of individual plans and provide for long-term planning:

Clause 3.3. states:

- 1. <u>Every regional council must develop long-term visions</u> for freshwater in its region and include those long-term visions as objectives in its regional Policy statement.
- 2. Long-term visions:
 - a. May be set at Freshwater Management Unit (FMU), part of an FMU, or catchment level; and
 - b. <u>Must set goals that are ambitious but reasonable</u> (that is, difficult to achieve but not impossible); and
 - c. <u>Identify a timeframe</u> to achieve those goals that is both ambitious and reasonable (for example, <u>30 years after the commencement date</u>).
- 3. <u>Every long-term vision must</u>:
 - a. Be developed <u>through engagement with</u> communities and <u>tangata</u> <u>whenua about their long term wishes for the water bodies and freshwater</u> <u>ecosystems</u> in the region; and
 - b. <u>Be informed by an understanding of the history of, and environmental</u> <u>pressures</u> on, the FMU, part of the FMU, or catchment; and
 - c. <u>Express what</u> communities and <u>tangata whenua want the FMU, part of</u> <u>the FMU, or catchment to be like in the future</u>.
- 4. <u>Every regional council must assess whether</u> each FMU, part of an FMU, or catchment (as relevant) <u>can provide for its long-term vision</u>, or whether improvement to the health and well-being of water bodies and freshwater ecosystems is required to achieve the vision.

According to Ministry for the Environment National Policy Statement Freshwater Management 2020 guidance document, long-term visions could have both long and short-term goals and different timeframes could be appropriate for short-term and long-term goals.¹

Considering the objectives of the Essential Freshwater package, a reasonable timeframe could be anything from 'stopping degradation immediately and reversing it in the short to medium term to restoring the health of water bodies in a generation'.

¹ Ministry for the Environment (Updated 2023) Guidance on the National Objectives Framework of the NPS-FM, pages: 38-40

This means that the content delivered in *The Statement for Long-Term Freshwater Vision GWRC* that the Rūnanga planners had communicated with you on the 30th of August 2023 (See appendix 1) is a reasonable request.

Below is a set of observations and considerations drawn from this Statement. It is important that these considerations are taken into account within the Proposed Variation 1 to the Proposed Change 1 to the RPS.

3. Considerations:

Based on the material provided in the Appendix-1, the request of Te Rūnanga o Toa Rangatira for long term provisions were to be consistent with the content provided in the Ngāti Toa Rangatira Statement for the Te Awarua-o-Porirua Whaitua Implementation Programme which is:

"Our vision is that the mauri (life force) of Te Awarua-o-Porirua is restored, and its waters are healthy, so that all those who live in the region, including Ngāti Toa and our manuhiri (visitors), can enjoy, live and play in our environment and future generations are sustained, physically and culturally."²

The vision statement above as well as the word 'vision' in this document suggested 'here and now' not necessarily a 'one day or in the future'.

A different approach was taken in 'Te Mahere Wai o Te Kāhui Taiao' where short-, medium-, and long-term expectations were set. Long term expectations were set around 30 years and plus but to mean to say the actions and implementation should be able to be seen within two generations. Te Mahere Wai acknowledges the boundaries of Clause 3.3. Long Term Vision for Freshwater and states that what is acknowledged in the Te Mahere Wai is ambitious but reasonable:

"These long-term visions set goals that are ambitious, reasonable and timebound, and outline the wishes of Mana Whenua for waterbodies and how they foresee the catchment could look in the future...

He wai mō ngā whakatupuranga are the moemoeā (long-term vision/aspirations) of Te Kāhui Taiao for the water bodies and freshwater ecosystems in the region.

We give a generational perspective of how Mana Whenua envisage the waterways might look from a generational approach. It is about our mokopuna (grandchildren). We have the expectation that our mokopuna

² **Te Rūnanga o Toa Rangatira (2019)**, *Te Awarua-o-Porirua Whaitua Implementation Programme: Ngāti Toa Rangatira Statement*, p:4

will see real improvement in water quality in their lifetimes based on the implementation of the recommendations we have laid down in Te Mahere Wai.³"

Note that during the Porirua Whaitua process, a National Policy Statement for Freshwater Management (2020) was not necessarily taken into account. Te Whanganui-a-Tara Whaitua process, implementating National Policy Statement Freshwater Management (2020) was front of mind and hence various references can be observed throughout the wording of Te Mahere Wai.

Another important consideration to include in any long-term vision of for Te-Awaruao-Porirua and Te-Whanganui-a-Tara is the direction provided in the National Policy Statement Freshwater Management Guidance as to producing short and long term goals to be expressed within different timelines. This will help then to clarify the purpose and the content of the long-term vision by way of providing a clear direction as to how and when a long term vision is to be achieved.

4. Suggested Changes and Feedback:

In the light of previous observations and considerations explained above, please see Appendix 2 and Appendix 3 for the suggested amendments **FW Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua** and FW **Objective TWT: Long-terms freshwater vision for Te Whanganui-a-Tara.** These are provided in track changes.

If you have any questions, please reach out to our planner Onur Oktem Lewis by emailing <u>onur.oktem@ngatitoa.iwi.nz</u>.

Ngā mihi nui,

Aimee Rei-Bishop

Kaiwhakahaere Te Mana Taiao Te Rūnanga o Toa Rangatira

³ Te Rūnanga o Toa Rangatira – Taranaki Whānui ki te Upoko o te Ika (2021), *Te Mahere Wai o Te Kāhui Taiao*, p:39

APPENDIX-1

Statement for long-term freshwater vision GWRC (Council communication 30th August 2023)

Greater Wellington Regional Council (GWRC) has proposed amendments to Fresh Water Chapter 3.4 of the Regional Policy Statement to insert long-term freshwater visions for Te Awarua-o-Porirua Whaitua and Te Whanganui-a-Tara Whaitua, as required by clause 3.3 of the National Policy Statement for Freshwater Management 2020 (NPS-FM).

Ngāti Toa Rangatira previously agreed to participate in GWRC's implementation of the NPS-FM seeing this is an opportunity to develop shared values, expectations and ensure that the voice of Ngāti Toa Rangatira was heard. Ngāti Toa Rangatira withdrew its appointed representative from the Te Awarua-o-Porirua Whaitua Committee in 2018 to allow the iwi to evaluate and articulate the views and aspirations for Te Awarua-o-Porirua. Ngāti Toa Rangatira is not comfortable to compromise on their values and their responsibilities as kaitiaki and will not compromise when it comes to restoring Te Awarua-o-Porirua Harbour Whaitua.

In the Greater Wellington Regional Policy Statement objectives for both Te Awarua-o-Porirua and Te Whanganui-a-Tara the long-term freshwater visions are proposed to be achieved by the year 2100. Te Rūnanga o Toa Rangatira understand that timeframes for freshwater visions are required as part of the NPS-FM.

However, a different approach has been taken in Te Mahere Wai where short term, medium term and long-term timeframes have been set out. The short term is identified as being between now and 10 years (pēpē me nga tamariki), medium term between 10 and 30 years (rangatahi me ngā mātua) and long-term as 30 plus years (ngā pakeke me ngā kaumātua). Within each of these timeframes there are different goals that have been identified. With a generational-mokopuna model being used to inform these timeframes, it is expected that real improvement in water quality will happen within the lifetimes of our grandchildren.

Ngāti Toa Rangatira have high expectations for Te Awarua-o-Porirua and Te Whanganui-a-Tara to be wai ora, and their waters to be revitalised including our goals around mahinga kai, and our associated tikanga and traditions. As stated in the Ngāti Toa Rangatira statement for Te Awarua-o-Porirua Whaitua Implementation Programme, the vision is to restore the mauri and health of the waters of Te Awarua-o-Porirua. As whakapapa connects Ngāti Toa Rangatira to wai, the mauri of our people is a reflection of the mauri of the wai making it crucial that real improvement occurs in the lifetime of our mokopuna. Most importantly kaitiaki responsibilities to restore the mana and mauri of our wai cannot be deferred onto the next generations. Therefore, the year 2100 proposed in the Regional Policy Statement does not completely align

with the aspirations that we had put forward in Te Mahere Wai and the Ngāti Toa Rangatira Statement on Te Awarua o Porirua.

APPENDIX-2

Objective TAP: Long-term freshwater vision for Te Awarua-o-Porirua

The mauri (life force) of Te Awarua-o-Porirua harbour, awa, wetlands, groundwater, estuaries and coast are wai ora (healthy), safe to access, sustainable for future generations 60 years after the commencement date of this Regional Policy Statement which is 2083, and:

- The values of Ngāti Toa Rangatira are upheld by way of revitalising and protecting Ngāti Toa Rangatirapractices and tikanga associated with Te Awarua o Porirua; and
- 2. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Ngāti Toa Rangatira and served to Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and
- 3. Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and
- 4. Provide for safe and healthy access for people and communities to enjoy a wide range of recreational activities including waka ama, swimming, fishing which will then foster a strong connection all waterbodies connected to Te Awarua o Porirua; and
- 5. Are taken care of in partnership with Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa as kaitiaki for the mana of Te Awarua-o-Porirua as a taonga; and
- 6. Are resilient to the impacts of climate change so that Mana Whenua and communities are resilient and are not negatively impacted by the impacts of climate change; and
- 7. The use of water and waterways provide for socio- economic benefits and take and use of water for human health are enabled as long as, the health and wellbeing of Te Awarua o Porirua and its waterbodies, freshwater ecosystems come first and are appropriately protected.

Long term vision for te Awarua o Porirua consist of short and long term goals that are outlined below:

Short term goals < insert Objective P.O2 FW > <insert Objective PO.3 Coastal>

Objective TWT: Long-term freshwater vision for Te Whanganui-a-Tara

A state of wai ora is achieved for Te Whanganui a Tara in which the harbour, rivers, lakes, wetlands, groundwater, estuaries and coast are healthy, accessible, sustainable for future generations 60 years after the commencement date of this Regional Policy Statement which is 2083. Mana Whenua has the expectation that mokopuna will see real improvement in water quality in their lifetimes based on the implementation of this long-term vision, and:

- 1. Mana Whenua practices and tikanga associated with Te Whanganui-a-Tara are revitalized and protected; and
- 2. Mahinga kai are abundant, healthy, diverse and can be safely gathered by Taranaki Whānui and Ngāti Toa Rangatira and served to Taranaki Whānui and Ngāti Toa Rangatira uri and manuhiri to uphold manaakitanga; and
- 3. Have mauri/mouri that is nurtured, strengthened and able to flourish and restored natural character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and
- 4. Provide for the safe (and healthy) access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including waka ama, swimming and fishing, that will then foster connection to these waterbodies; and
- 5. Are taken care of in partnership with Taranaki Whānui and Ngāti Toa Rangatira giving effect to the rights, values, aspirations and obligations of Ngāti Toa and Taranaki Whānui that respects the mana of Te Whanganui-a-Tara and the whakapapa connection with Taranaki Whānui and Ngāti Toa Rangatira; and
- Are resilient to the impacts of climate change so that Mana Whenua and communities are resilient and are not negatively impacted by the impacts of climate change and
- 7. The use of water and waterways provide for socio- economic benefits as long as, the health and well-being of waterbodies and freshwater ecosystems or the take and use of water for human health needs are appropriately protected from harm first.

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