

## Submission to Commissioners re UHCC IPI – 26<sup>th</sup> April 2023

Good afternoon, Commissioners.

My name is Bob Anker.

I live in Upper Hutt, Katherine Mansfield Drive with my wife Delia, where we built our home on 7 acres of land 37 years ago. We live on flat land bordering the area identified as the “Mangaroa Peatlands”.

10 odd years ago we split our land into two titles and my daughter, her partner together with our 13-year-old granddaughter are currently building their own home adjacent to us.

As an extended family we are fully invested in the land.

I do not lay claim to a raft of academic qualifications but I do have an analytical mind with an ability to recall detail. I am able to rapidly read and understand technical documents and concepts, cross referencing them to other documents.

Within the last 5 years I have been part of community consultations on National Policy Statements regarding Indigenous Biodiversity (SNA) – Fresh Water, Fresh Water Management, Highly Productive Land and now Urban Development. GWRC – Regional Policy Statement and PC1. UHCC – Plan Change 50, Plan Change 47, Private Plan Change 55. To sum it up – a truck load of stuff.

I take an active interest in my community and am a spokesperson for the Mangaroa Peatland Community Group. To use the vernacular – our Group has skin in the game. With respect to GWRC Regional Policy Statement – PC1, our Group submitted some 42 out of a total of 124 submissions and will be speaking at the hearings, when they eventually occur.

Our Group presented on 3 separate occasions to GWRC Environment Committee to lobby concerning perceived threats to our Mangaroa Peatland properties and lifestyle.

We understand that the scope of the IPI relates to the Urban area – hence, National Policy Statement – **Urban** Development. GWRC seems determined to expand the scope to incorporate matters which relate to the Rural area, specifically the Mangaroa Peatlands. I will return to this later.

### **IPI - Zone overlap.**

In my submission regarding the IPI, I raised concerns regarding the potential overlap of differing zones. Matt Muspratt (UHCC) responded that he was unable to identify any areas where overlap existed.

UHCC has produced a map showing the different areas, which unsurprisingly does not show any overlap. If, however, we look at NPS–UD we come up against the criteria which refers to the walkability factor – ie. Within walking distance of . . . .

If we apply the “walkability” test to Silverstream station – for example – the zone extends on one side of the railway to incorporate the Town Centre and on the other side to incorporate the Saint Pat’s area. The rules applying to each of these areas differ markedly from each other.

I am not overly concerned as to which methodology is applied – only that there should be certainty and consistency. It is not sufficient for UHCC to state “we chose to make changes” unless detailed reasoning is given which places the decision beyond dispute.

### **Evidence given on behalf of GWRC**

I apologise in advance to the Commissioners for taking their time by having to respond to Expert evidence presented on behalf of GWRC.

Each of the three Expert evidence documents introduce new material to the IPI and I considered that it was not appropriate to allow them to pass into the record without comment.

Throughout these three documents, generalisations are made and presented as if they are statements of fact, with their relevance to the IPI being debateable.

**Expert Evidence GWRC – Pam Guest – Nature Based Solutions – combined with a diatribe on climate change.**

As stated earlier, I am a spokesperson for the Mangaroa Peatland Community Group. We are a collection of some 80 households owning properties which comprise or border the Mangaroa Peatland. As a result of this fact, together with past actions of GWRC (court case Adams & others to name but one) we take an active interest in matters broached by both GWRC and UHCC that have the potential to impact on us as a thriving community.

At the end of the RPS- PC1 document is a Glossary which contains the definition of “Nature Based Solutions” which includes the phrase “Protecting peatland to retain carbon stores.” GW maintain that the phrase is just an example and not an operative clause.

As part of an Official Information Act request, I asked for papers and presentations for workshops together with papers documenting the decision-making process to include the peatland in the proposed RPS – PC1 climate change strategy. The response I received stated **Peatland has no mention in the climate change strategy or climate action plans.**

I was also advised that **There are no papers and presentations prepared for workshops.**

In her expert evidence, Pam Guest references “Nature based solutions”, at least 10 times and quotes “protecting peat” as a part of climate change action plans. This leaves me somewhat confused as to whether the statements from Matt Hickman in

response to my OIA are accurate or whether, once again, a GWRC officer has gone off-piste.

“Restoration of ecosystems”, is referred to. I ask the same question that was posed by Justice Dwyer in the Adams case. That is - what is the former state that the ecosystem is to be restored to? Justice Dwyer was unable to get an answer to his question.

I would maintain that GWC should not be encouraged to use vague generalisations when presenting evidence.

### **Expert evidence GWRC – Stuart Farrant**

Having read this expert evidence I am left wondering exactly what Mr Farrant is trying to say. The impression I get is that this evidence is more directed towards the authors of the NPS–UD rather than being targeted towards UHCC and the IPI.

Mr Farrant gives us an example of water catchment in Kapiti with a tank capacity of 10,000 litres. With a small roof footprint of only 100 square metres, 50mm of rain would fill the tank. What then happens with the next 50mm?

Nature Based Solutions are referred to. Water bodies are mentioned but not defined and accordingly riparian margins are not identifiable.

It appears to me that Mr Farrant has not tailored his evidence to the Upper Hutt realities, where the majority of the High-Density areas around the rail corridor are on relatively flat land. Where intensification on the slopes is proposed then the protections in draft Plan Change 47 would come in to play.

In his evidence Para. 37, Mr Farrant makes specific favourable mention of the Wallaceville Estate development, which in all probability will form a benchmark for ongoing, large scale development in Upper Hutt. This would seem to make his earlier observations largely redundant.

## **Expert evidence GWRC – Richard Sheild.**

In his paragraph 20 Mr Sheild quotes the Housing bottom lines that Upper Hutt is required to achieve. As I understand it, that figure has been revised upwards, which means that Mr Sheild's number is understated by some 39%.

In para 21 Mr Sheild shows a series of tables intended to demonstrate water quality in Upper Hutt waterbodies. Regrettably he has chosen to use only Māori nomenclature which means that 95% of the populace will have no idea to what he refers. Mr Sheild then further advises us that some of these waterbodies fall within the IPI but his tables do not indicate which ones. He then gives us a footnote which takes us to a link which takes us to another 108-page document. At that point Mr Sheild, I lost the will to live!!!

To make matters worse (if that is possible) the tables show the narrative "A" or "B" or "C" or "D" with no tabular key.

The notations show "Improving" or "Worsening". - Compared to what??

That concludes my submission.

Thank you for the opportunity to be heard.

Submission ends.

Bob Anker