



TE RŪNANGA O NGĀTI AWA

Bay of Plenty Regional Council

Tena koe

*Mā te ngaruru ō ngā whenua maru ō Ngāti Awa, ka noho momoho nga taonga koiora, taonga tuku iho, hei oranga whānui mō ngā whakatipuranga*

As the lands of Ngāti Awa flourishes, opportunities abound for future generations to enjoy their unique ecological, environmental, and cultural uniqueness.

## **TE RŪNANGA O NGĀTI AWA ASSESSMENT OF RESOURCE CONSENT APPLICATION FOR NON-SCHEME EROSION WORKS WITHIN THE BAY OF PLENTY REGION**

Te Rūnanga o Ngāti Awa (TRONA) is a local iwi authority, a post settlement governance entity, and a representative body for 22 confederate hapū.

### **Introduction**

Thank you for your correspondence regarding a resource consent application by Bay of Plenty Regional Council (the Applicant). TRONA understand the proposal requires consenting for the proposed discretionary activities under the Non-Scheme Erosion Works project (NSE). This includes the following activities:

- Riparian earthworks to repair stream banks
- Coastal margin earthworks
- Disturbance to the beds of streams to remove accumulations of sediment
- Diversion of stream channels where it is deemed necessary to alter the existing channel
- Placing structures in streams to anchor plantings
- Removal of trees from stream banks
- Diversion of stream channels
- Clearance and ongoing maintenance of stream mouths in designated coastal areas to carry out re-alignment and prevent debris blockages within significant indigenous biological diversity areas.

The areas covered by this application include a wide range of the Bay of Plenty and includes sections of coastline between Otamarakau and Matata and between the eastern side of the Ohiwa harbour entrance and Cape Runaway as well as the rivers and streams which flow into the Ohiwa harbour. The application mentions most works are carried out in areas which hold permitted activity status and works are only carried out otherwise, where there is a need to alleviate or prevent upstream flooding problems.

## Ngāti Awa

We recently launched our Ngāti Awa Environment Management Plan (“The Plan”) which outlines our relationship with our natural resources, highlights tangata whenua and cultural values and expectations around engagement and implementation of policies and objectives. It is also a tool that can influence other management plans, planning documents, policy statements and legislation. The main target audience is government, district and regional councils, resource consent applicants and/or consultants. Although this plan was informed and shaped by Ngāti Awa hapū and whanau, it does not attempt to articulate values, interests, aspirations, or policy position(s) of Ngāti Awa hapū. It does not supersede or replace any planning document prepared by Ngāti Awa hapū. The Plan has a lifespan of 10 years with a review term of 1 year. The Plan does not substitute consultation or engagement with Ngāti Awa and the full document can be found at [www.ngatiawa.iwi.nz](http://www.ngatiawa.iwi.nz)

TRONA objectives require land use planning, management and decisions to recognise Ngāti Awa values, interests and Mātauranga. We value our intergenerational knowledge and role as a Treaty partner, and recognise the linkages between land use, freshwater quantity and freshwater quality.

We encourage greater collective responsibility and integrated management to ensure that land use and development within our rohe is sustainable and consistent with natural limits of our lands and waters. It is our responsibility to ensure this does not compromise the productive capacity of our soils or life supporting capacity of our environment.

## Comments

We are vulnerable to natural hazards and the effects of climate change, in particular, our marae and urupa; our homes and communities as well as our natural environment and mahinga kai resources.

Our sites and areas of cultural significance are at risk of damage or destruction by natural hazards, particularly in the vicinity of coastlines, rivers and floodplains. Our indigenous biodiversity (comprising flora and fauna) and associated ecosystems are also impacted by: Human activity – land drainage, clearance, fragmentation; contaminant discharges as well as waterway modification.

Our ancestral connections to land and its water resources are matters that must be recognised and provided for under s6(e) of Resource Management Act 1991.

Our biodiversity Objective 24 outlines our intentions of encouraging the restoration and enhancement to the health and diversity of ecosystems and habitats within our rohe for our taonga and flora and fauna species. This includes:

- a) Cooler and vegetated waterways and wetlands
- b) Corridors of healthy interconnected indigenous vegetation and ecosystems
- c) Healthy and abundant mahinga kai resources.

Policy 7.2.4 seeks to promote the creation and/or connection of ecological pathways for our indigenous flora and fauna comprising corridors of ngahere, wetlands, riparian margins, and other habitats. This should be prioritised as follows:

- a) From our upper catchments to the coast.
- b) Connecting fragmented habitats within, and across, catchments.

We encourage Councils to consider the above when carrying out works under this consent and support the need to alleviate or prevent further flooding issues in our rohe. However, it is important

to consider TRONA are opposed to discharge of contaminants to our rivers and natural waterways, should discharges be a factor in this proposal.

In relation to the consent application for the proposed earthworks, TRONA are supportive of the following:

- All works will be undertaken in a manner that avoids adverse effects on sites of cultural significance. Relevant hapū will be consulted if sites are identified in certain work areas.
- Any sites of cultural significance will be identified, and specific measures implemented on certain areas.
- Works are typically carried out in fertile lowlands or flood plains so indigenous vegetation and habitats are unlikely to be affected. If areas of significant vegetation need works, it would need to be threatened by bank erosion for works to be considered.
- Works will be avoided in bird nesting, fish spawning, migration periods and breeding seasons.
- There are areas where instream disturbance may be necessary, and the activities are likely to have short term effects on the surrounding environment.
- Management plans will be implemented where risk is high.
- Consideration has been given to erosion and sediment controls on site, so the stability of the land can be monitored and maintained.
- Control of all run off and sediment will be contained or managed effectively.

We are unopposed to the proposal provided the following matters can be addressed:

- Dust monitoring and management is adhered to where earthworks are necessary (i.e. using water carts, ceasing work until the wind strengths decrease, controlling route and speed of vehicles, and temporary stabilisation methods).
- Erosion and sediment controls described are adhered to (including but not limited to sediment ponds, bunds, silt fences, clean water diversions,)
- There are minimal effects on native vegetation, significant flora, and fauna species.
- Carefully monitor the use of water to moisten works areas as required and ensure efficiency of use.
- Eliminate any risk of contaminants entering natural waterways.
- In the event of any archaeological site or koiwi being uncovered during the exercise of this consent, activities in the vicinity of the discovery shall cease. The consent holder shall contact the Council to obtain details of the relevant iwi authority. The consent holder shall then consult with the relevant iwi authority and Heritage New Zealand and shall not recommence works in the area of the discovery until the relevant Heritage New Zealand approvals or other approvals to damage, destroy or modify such sites have been obtained where necessary;
- Accidental discovery protocol is agreed to and signed, for the proposed earthworks site; and
- Dust, sediment and erosion control measures proposed are adhered to.

We would appreciate receiving a direct response. Additionally if you have any questions, please contact me Jaymie-Kate Wardlaw (Consents and Policy Planner) or Michal Akurangi (Manager Taiao) by email [kaitiaki@ngatiawa.iwi.nz](mailto:kaitiaki@ngatiawa.iwi.nz)

Nga mihi,

A handwritten signature in blue ink, appearing to read 'Jaymie-Kate Wardlaw'.

(pp sign Jaymie Wardlaw)

**Leonie Simpson**

**Chief Executive**