

## **Friends of the Maitai - Oral Submission PPC 28 Hearing July 2022**

My name is Steven Gray. I am one of the fortunate few to live in Nelson with a birdseye view of the Maitai River from my living room and kitchen. I've lived near, swum in, and closely watched the river for 24 years. Today, I am presenting as one of the Friends of the Maitai, a community environmental group advocating for the protection and improvement of the Maitai or Maitahi River.

Since 2014, Friends of the Maitai has been conducting monthly river monitoring, fortnightly riparian planting and weeding, lobbying (particularly related to the impact of pine forestry on river health) and education on river ecology. We have 350 members on our mailing list and have been active in the local debate on how best to protect and improve the river.

Nelson is fortunate to have a significant river running through the city. The Maitahi or Maitai is the source of our drinking water and supports eels, whitebait, the occasional trout and a reasonable population of invertebrates. Does the water quality need to improve? Absolutely!

While industrial forestry is the biggest threat, extending urban development upstream further threatens water quality and river ecology. This is the focus of our submission today, as we seek assurance that if the development goes ahead it should:

- Maintain the amenity value of the Maitai River and Maitai Valley
- Improve water quality in the river
- Ensure there is no impact of sediment and stormwater on river ecology and associated habitat
- Require future subdivisions within the PPC to be subject to strict Resource Consents

We recommend Private Plan Change 28 be rejected unless strict, robust and measurable provisions are in place to protect the water quality of the Maitai River during the construction phase, and that long-term solutions are in place to ensure runoff from the subdivision does not harm the river.

One of the biggest problems with this PPC is the lack of information on how the flood risk will be managed. Changes to the floodplain, additional stormwater flows, and increased severe weather events mean the flood risk downstream is inevitably greater. The plan change does not sufficiently address these issues and their potential impacts.

The plan change does not include sufficient detail on how sediment will be dealt with or how it will meet the requirements of the National Policy Statement on Freshwater. As outlined in the advice from the Cawthron Institute, a comprehensive sediment/erosion management plan for the proposed development is necessary, given the high risk of erosion and sediment runoff into waterways.

As noted in the supporting advice from the Cawthron Institute, we ask that:

- The Kāka Stream realignment and other changes to the Maitai River floodplains during construction should not increase flood risk or have any negative impact on the ecology and natural character of the Maitai River.
- The water quality and river ecology is protected from sediment and all other pollutants once all construction is completed.

The old paradigm of thinking about river ecology has been replaced. We no longer believe that each significant rain event will clean the fine sediment out of the river bed. We now understand that rivers have limits in terms of the sediment they can absorb and we have to actively work to improve river ecology. The status quo isn't good enough. Continuous river improvement is the new paradigm.

Our challenge with this PPC is that sediment from the construction phase of this development will be significant. Any sediment mitigation strategies during construction must be able to handle the runoff of water and heavy metals that come from cars and trucks using dirt roads, so sediment and other pollutants are absorbed before they reach the Kāka Stream or the Maitai River. While we might believe it is possible to prevent sediment and heavy metals from coming into the river during construction, it is difficult to have confidence in our local Council to adequately monitor and catch these problems during the construction phase. We recently saw our Council fail to protect Maire Stream residents from developers inadequately protecting the waterway from construction erosion.

As a result, we must trust the developers have the capacity to take the necessary steps to protect and preserve the water quality, and river ecology of the Maitai River. This is also a challenge as the developers have not yet published enough information on the specific measures they will have in place to protect water quality, river ecology and the amenity value of swimming holes adjacent to and downstream from the subdivision. The lack of detail on how and when sediment traps, protective berms, and other river protection measures will be in place makes it impossible to have confidence the developers know what they are doing.

Their poor track record on sediment control on the Bayview side of the hill only adds to our lack of confidence in their ability to contain sediment runoff.

Since critical aspects of the development are not detailed or supported by technical information at this stage, there are no clear and effective controls on how erosion will be handled. This leaves the Council in a difficult position and places considerable uncertainty on whether subsequent detailed development consents would be approved and adequately monitored.

As a result, we ask that, should PPC 28 proceed, all future subdivisions and buildings within Kāka Valley/Bayview be subject to the strictest resource consents and widely notified to the public.

The river and river valley are important to Nelsonians of all ages. The river valley provides ready access to nature, something which science is telling us is vital to wellbeing. Older people use this area for peaceful walks and drives, fit adults and teens use it for active recreation and for kids the river provides a place to just

creatively muck about – to make dams, float boats and test themselves by leaping into the water from a rope swing.

Friends of the Maitai are asking this panel to decline PPC 28 unless they can be certain all the attributes of the river and valley are protected or enhanced during the construction phase and into the future.