

Te Tumu Landowners Group

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Pim de Monchy – Project Manager
Bay of Plenty Regional Council
PO Box 364
WHAKATANE 3158

By Email: pim.demonchy@boprc.govt.nz

Dear Pim,

**Re: Kaituna River Re-diversion and Wetland Creation Project
Pre-Consent Consultation Feedback by Te Tumu Landowners Group (TTLG)**

Please find attached the TTLG feedback on the Kaituna River Re-diversion and Wetland Creation Project.

As you are aware TTLG is very interested in this project and would appreciate the opportunity to meet with you and go through our feedback items and associated concerns.

The TTLG feedback as attached is centred in the following areas:

1. Future Urbanisation of Te Tumu and Rangiuru.
2. Current and Future Activities and Processes.
3. Recreation.
4. Ocean Access.
5. Flooding.
6. Erosion.
7. Water Quality / Salinity / Ecology.
8. Cultural and Historic Heritage Considerations.
9. Morphological Impacts.
10. Possible Refinements.
11. Cost of Project.
12. Consultation.

Yours faithfully,



Jeff Fletcher
For and on Behalf of the Te Tumu Landowners Group

enclosure

Te Tumu Landowners Group

Kaituna River Re-Diversion and Wetland Creation Project

Pre-Consent Consultation Feedback

1. Introduction

The proposed Kaituna River Re-Diversion and Wetland Creation Project ('the Project') is a significant project for the Bay of Plenty both in terms of the benefits sought, the potential consequential benefits and outcomes and the potential consequential risks and issues associated with 'the Project'.

The Te Tumu Landowners Group (TTLG) feedback is centred on:

- (a) Taking into account the wider operating and natural environment and a wide range of potential consequential issues and risks.
- (b) Taking into account current and future activities and processes.
- (c) Taking into consideration the land uses changes that will occur in the lower Kaituna River area over the next 50+ years, the impact of 'the Project' will have on these land use changes and the potential for 'the Project' to take into account these land use changes to provide wider long term benefits.

The Te Tumu Landowners Group seek that their feedback is taken into consideration in both the proposed hydrological and hydraulic modeling and the resulting Assessment of Environmental Effects (AEE).

2. Future Urbanisation of Te Tumu and Rangiuru

The pre-consent consultation feedback information provided provides no recognition of the significant changes that will occur in the area (upstream to the new TEL Kaituna River bridge, if not to the existing SH2 Kaituna River bridge) with the urbanisation of Wairakei, Te Tumu and Rangiuru.

TTLG submit that:

- 'The Project' needs to consider the implications and requirements of the significant growth that will occur in the area over the next 50+ years, with the population for Papamoa and Papamoa East predicted to increase by 40,000 in this time period.

- Water based commercial and recreational based requirements and opportunities need to be considered and provided for, particularly safe ocean access through the Te Tumu Cut.
- Consideration of Tauranga City Council’s proposed variation to the Papamoa Comprehensive Stormwater Consent is required.

3. Current and Future Activities and Processes

The information provided does not recognise, acknowledge or consider the following current and future activities and processes:

(a) **The Kaituna River Authority**

The establishment of a new statutory body called Te Maru o Kaituna (“**the Kaituna River Authority**”) as part of the Tapuika Treaty Settlement.

We understand that the Kaituna River Authority will be formed following the Tapuika Treaty Settlement being enacted through legislation in the next 6-12 months.

As identified in the Tapuika Treaty Settlement:

*“The Kaituna River Authority will prepare and approve a document for the Kaituna River (“**Kaituna River Document**”) [building on the current Kaituna River and Ongatoro/Maketu Estuary Strategy].*

5.59 The purpose of the Kaituna River Document is to:

5.59.1 Encourage the restoration, protection and enhancement of the environmental, cultural and spiritual wellbeing of the Kaituna River;

5.59.2 Provide, as appropriate, for the social and economic wellbeing of people and communities;

5.59.3 Identify the significant issues for the Kaituna River; and

5.59.4 Identify the vision, objectives and desired outcomes for the Kaituna River.”

The Kaituna River Document will significantly influence the future changes and management of the Kaituna River – particularly the Lower Kaituna River.

While ‘the Project’ proposal and actions are likely to have some alignment with the future Kaituna River Document, it is important that ‘the Project’ does not pre-empt or head in directions that may be different to those to be developed.

(b) **The Kaituna Catchment Control Scheme (KCCS)**

The KCCS manages a significant area of 1,250 square kilometers which includes large areas of valuable dairy land which provides a significant contribution to the regional economy; and via a targeted rate scheme manages the potential flood and drainage impacts on this land.

Considerable investment has and continues to be made in this scheme and needs to be considered with regard to the potential impacts of 'the Project', particularly in terms of pump station management.

(c) The Lower Kaituna Wildlife Management Reserve (LKWMR)

The LKWMR is a significant remnant wetland reserve of approximately 230ha which through the Tapuika Treaty Settlement will be vested into a governance entity and then gifted back to the Crown.

The current administrator, the Department of Conservation, in association with Eastern Fish and Game have created a notable game shooting /bird watching recreational area and have draft management plans to convert pastoral lease back into wetland. All of this is dependent on water supply from the river and the proposed Kaituna River Re-Diversion needs to confirm the future water supply regime to this reserve.

(d) Exiting Wastewater Discharges into the Lower Kaituna River

There are two existing wastewater discharges into the Lower Kaituna from:

- (i) The Te Puke Wastewater Treatment Plant, and
- (ii) The Affco Rangiuru facility,

which contribute to the water quality environment of both the Lower Kaituna and Maketu/Ongatoro Estuary.

The Resource Consents for these discharges will come up for renewal in the next 3-7 years.

From a water quality perspective (see below) these are significant considerations which have not been addressed in the pre-consent documentation.

4. Recreation

'The Project' pre-consent documentation provides little recognition or acknowledgement of opportunities for water based recreation (with the exception of shore based fishing) particularly in the context of the future population of the area that will come as a result of the urbanisation of Wairakei, Te Tumu and Rangiuru.

In addition to shore based fishing and white baiting, recreational opportunities for the lower Kaituna River and Maketu/Ongatoro Estuary include:

- Swimming,
- Boating,
- Kayaking / Canoeing,
- Rowing,

- Waka ama,
- Rafting, and
- Sailing.

5. Ocean Access

Potential issues with regard to access to the ocean from both the Te Tumu entrance and Maketu/Ongatoro entrance have been acknowledged, however the proposals for 'the Project':

- (a) Need to address these access points to the ocean which will be required in the future for recreational, commercial and emergency access requirements.
- (b) Need to robustly address the potential morphological effects of the change in flow patterns, particularly the possibility of a progressive reduction over time of the capacity of the Te Tumu Cut, and consequent effects on navigability and flood capacity (and hence flood levels upstream).

There are already very limited access opportunities to the ocean in the Western Bay of Plenty sub-region and consideration to improving this access as part of 'the Project' and acknowledgement of the demand for marine based recreational facilities and access for marine based recreation is required.

Also not acknowledged or addressed is the existing Bell Road boat ramp and potential impacts on it.

6. Flooding

The potential flooding risks of 'the Project' require careful consideration and detailed hydrological and hydraulic modeling.

Flooding issues and risks to be considered include:

- Increased flooding risk to the low lying TTLG and other private land on the north side of the Lower Kaituna River. This land is not stop banked.
- Increased flooding risk to Ford Island – also not stop banked.
- Increased flooding risk to Maketu township and the surrounding low lying areas.
- Impact on the level of protection provided by the existing Kaituna River stopbanks and associated Kaituna Catchment Control Scheme works.
- Impact on the Lower Kaituna Wildlife Management Reserve.
- Impact on the Bell Road boat ramp.
- Impact on existing and proposed infrastructure including the Tauranga Eastern Link (TEL), the TEL Kaituna River Bridge, the Kaituna Link and the Bell Road Pump Station.

- The frequency of discharges from Lake Rotoiti via the Okere Gates. These are likely to coincide with heavy rainfall events in the Lower Kaituna River; and the resultant downstream high river levels combined with Lake Rotoiti discharges can cause downstream flooding as was the case in 2007 when the Bell Road boat ramp went under water.
- The impact of storm surges and king tides on the river and associated flooding risks.
- Climate change considerations.

7. Erosion

'The Project' pre-consent documentation identifies potential erosion issues which will require further careful consideration through detailed hydrological modeling.

Erosion issues and risks include:

- Increased erosion risk to the low lying TTLG land on the north side of the Lower Kaituna River. This land is not stop banked.
- Ongoing erosion to the Ford Land Holdings land that resulted from the Kaituna River works in the early 1980's that created Ford Island. Hard walling of this area is required.
- Erosion of Ford Island – this has eroded considerably in the last 25+ years and will require hard walling.
- Erosion impacts within the Maketu/Ongatoro Estuary particularly the protected spit area and associated channels.
- Increased erosion of the Kaituna River stopbanks.

8. Water Quality / Salinity / Ecology

'The Project' pre-consent documentation identifies that one of the risks associated with the project is that water in parts of the estuary may have slightly higher levels of bacterial contamination. This is a concern, with one of the key benefits of 'the Project' noted as being improving habitat for kaimoana.

Improving the river and estuary water quality should be a primary consideration with regard to the project as without this the key project actions of improving the ecology of the estuary, improving habitat for kaimoana and enabling swimming will be compromised.

In this context there is no mention in 'the Project' pre-consent documentation with regard to initiatives to address the Lower Kaituna River water quality issues.

We seek that consideration be given to prioritising the improvement of the Lower Kaituna water quality and carrying out further research into the impact of the current

Lower Kaituna water quality on the health of estuary as a result of the increased flows into the estuary proposed through 'the Project'.

We note that the two re-diversion options are centred on getting as much freshwater into the estuary as possible.

We understand that the saltwater 'wedge' extends approximately 1km upstream and we would like the hydrological modeling to provide further detail with regard to the expected increase in the additional amount of freshwater and saltwater expected to enter the estuary as both a total and as a percentage of total estuary freshwater and saltwater per tidal cycle.

Additionally the impact on the saltwater 'wedge' needs to be considered with regard to changes that may affect the ecology, fauna and flora and recreational fishing (including white baiting) environment of the Lower Kaituna River.

The Maketu/Ongatoro Estuary contains:

- A wildlife reserve,
- Significant ecological areas,
- Areas of High Natural Character, and
- Areas with high landscape values,

It will be important to understand the potential impacts (positive and negative) of 'the Project' on the estuary ecology and associated values (as detailed above). We seek that this is investigated.

9. Cultural Heritage and Historic Heritage Considerations

The Lower Kaituna River and Maketu/Ongatoro Estuary has considerable cultural heritage and historic heritage significance, both Maori and European, which has been given little recognition in 'the Project' pre-consent documentation.

A considerable amount of historical information was provided as part of the Kaituna / Maketu Strategy development through the History Focus Group.

Through this Focus Group the following Iwi/Hapu and the Ford Family produced History Reports / Publications:

- Waitaha,
- Tapuika,
- Ngati Whakaue ki Maketu,
- Ngati Pikiiao.

These reports / publications provide a valuable cultural and historic record of the Lower Kaituna River and Maketu/Ongatoro Estuary area, which requires recognition and consideration with regard to 'the Project'.

The significant history of the area is also well documented in the following books:

- Te Arawa: A History of the Arawa People – Don Stafford.
- Historic Maketu – Enid Tapsell.
- A History of Tauranga County – Evelyn Stokes.
- The Story of Te Waharoa: A Chapter in Early New Zealand History; Together with Sketches of Ancient Maori Life and History – J.A. Wilson.
- The Journal of Ensign Best, 1837-1843 – N.M. Taylor.

10. Morphological Impacts

'The Project' pre-consent documentation identifies uncertainties with regard to impacts on the lower estuary and Te Tumu Cut morphology.

The morphological impacts to both the river and coastline also need to be considered and our expectation is that these impacts will be considered as part of the detailed hydrological and hydraulic modeling to be carried out.

The coastal morphology changes are likely to impact the navigability of the both the Te Tumu entrance and Maketu/Ongatoro entrance.

11. Possible Refinements

We note under paragraph 5.4 (p14) of the Scoping Report for the AEE that there are a number of possible refinements, however it is unclear whether these will be included in the hydrological and hydraulic modeling to be carried out.

We seek that these refinements are included in the proposed hydrological and hydraulic modeling.

With regard to climate change effects we do not see this as a possible refinement; this should be part of the overall key considerations for 'the Project'.

12. Cost of The Project

There is no mention on the capital cost of 'the Project' and how 'the Project' will be funded (eg rates funded?).

This will be an important consideration moving forward from a community and community engagement perspective and we seek that 'the Project' costs are provided, for both the investigation, design and consenting stage and for its construction.

13. Consultation

As noted above 'the Project' is significant for the region both in terms of the benefits sought, the potential consequential benefits and outcomes and the potential consequential risks and issues.

In this context we seek that a comprehensive consultation process is developed and carried out.

We would see the stakeholders and groups to be included in this process to include:

- All Iwi and hapu located within the Kaituna River and Maketu/Ongatoro Estuary catchment area.
- Landowners and landowner groups adjoining the Kaituna River and within the Lower Kaituna River Catchment area.
- Ratepayers to the Kaituna Catchment Control Scheme.
- Community groups within the Kaituna River and Maketu/Ongatoro Estuary catchment area.
- Environmental groups within the Kaituna River and Maketu/Ongatoro Estuary catchment area.
- Recreational users of Kaituna River and Maketu/Ongatoro Estuary including recreational fishers, white baiters and 'boaties'.
- Commercial users Kaituna River and Maketu/Ongatoro Estuary.
- Emergency and Civil Defence users and authorities eg Maketu Coast Guard.
- Infrastructure providers including NZTA.
- The Western Bay of Plenty SmartGrowth Strategy Partnership, and
- Territorial Authorities within the Kaituna River and Maketu/Ongatoro Estuary catchment area.