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Committee Staff
Environment Committee
Parliament Buildings
Wellington 6140

WHITEWATER NEW ZEALAND'S SUBMISSION ON THE NATURAL AND BUILT ENVIRONMENTS BILL

1. Whitewater NZ (WWNZ) is the advocacy body for recreational whitewater river sports in Aotearoa. Our membership of approximately 4,000 is made up of kayakers, canoeists, pack-rafters, rafters and many other whitewater river enthusiasts. Our mission is to protect and restore Aotearoa's whitewater rivers and enhance opportunities to enjoy them safely. Our membership and executive consist of professionals in river sports and athletes, with sound appreciation of the many facets of paddle sports. We are considered experts in this field.
2. Whitewater New Zealand, in principle agrees with most of reform offered in the Natural and Built Environments Bill, with the following exceptions:
 - a. **Amenity values** ought to be included as a system outcome under s 5.
 - b. **Herenga ā Nuku Aotearoa/ Outdoor Access Commission should be included** as a consulted party under schedule 7, s 22(1).
 - c. **Geological and geomorphic processes** (including sediment flow) ought to be included under the interpretation of '*natural environment*' under section 7.
3. The rationale for each of these specific objections are discussed in detail below.

ONE: Amenity values ought to be included as a 'System Outcome' under section 5

4. The purpose of the bill is stated as to 'support the well-being of present generations without compromising the well-being of future generations'¹, it would be an error to not consider the effect outdoor recreation has on the well-being of all New Zealanders and visitors.
5. The value of connectedness between people and the environment, is well documented,² it results in improved health, community, and environmental outcomes. Whitewater New Zealand strongly believes that the protection of Aotearoa's long-standing culture of outdoor recreation, and thus our connection with the environment is an essential policy for health,

¹ Natural and Built Environment Bill, section 3 (a)(i).

² <https://www.doc.govt.nz/Documents/science-and-technical/sfc321entire.pdf>



economy and environment. As such we ask that the amenity value of land is considered and protected within the 'system outcomes' section of the Bill.

6. To not include the amenity value of the environment in considerations of national and regional policy, and consents, could cause poor protection of hugely popular and important spaces. Should a space (such as a whitewater course, or slalom site) already be highly modified its maintenance and perpetuity would not be prioritised within any of the system outcomes under s 5.
7. There are thousands of parks, playgrounds, river features, beaches, mountain bike parks, walking tracks, ski fields et cetera which would benefit from gaining priority under section 5. It is these spaces that New Zealanders seek for recreation and connection with their environment and community. Thus, high *amenity value* ought to be protected.
8. It is Whitewater New Zealand's submission that the legal framework should consider these amenity values alongside protecting the environment's natural condition.

TWO: Herenga ā Nuku Aotearoa/ The Outdoor Access Commission ought to be included as a consulted party under schedule 7 section 22(1)

9. Schedule 7, lays out the process for preparation change and review of the natural and built environment plans, these plans will certainly discuss issues relevant to recreators, such as access to and from rivers, tracks, parks, beaches and other areas which New Zealanders enjoy. As such, Whitewater New Zealand asks that this process is done in a way which considers the interest of recreation generally.
10. Furthermore, by including Herenga ā Nuku Aotearoa as one of the parties it helps achieve consistency with the system outcomes of this Bill, one such outcome is 'public access to and along the coastal marine area, lakes, and rivers'³.
11. Outdoor Access Commission is best placed to represent the interests of hundreds of recreational organisations, including ourselves, as a crown agency which has the systems in place to both hear specific concerns of groups and landowners and present them at the forum suggested under Schedule 7.

THREE: Geological and geomorphic processes need to be included under the definition of the 'natural environment' in the interpretation section of the bill (section 7).

12. As a series of islands, formed and constantly changed by exceptional forces of geology, it is important to remember that these processes continue to shape our whenua and impact activities that we do upon it. Earthquakes, eruptions, sedimentation, and longshore drift are among many processes that continue to change our environment and it would be an error to make long term national plans, without first taking those processes into account.

³ Natural and Built Environment Bill, section 5 (g)



Whitewater NZ

Mo ngā awa te aroha, he waiaroa For the love of rivers

13. This is especially the case in the face of climate change, with sea levels rising and dramatic changes in climate which will accelerate certain geomorphic processes, such as erosion. Whilst we certainly cannot prevent geomorphic processes from occurring it is important to realise that they fundamentally make a part of our natural environment.
14. Sediment flow, for example, is crucial for the later deposition on beaches around the country, counteracting the impacts of erosion. As such it is our submission that when considering the 'natural environment' of certain beaches it is pertinent to consider the source of the sand (i.e., longshore drift) a part of the beach's natural environment.
15. For these reasons we believe that a wider definition of 'natural environment' should be adopted. One that considers the geological and geomorphic processes which fundamentally shape our whenua.

IN CONCLUSION

16. Whitewater New Zealand agrees in principle with most of the proposed reforms in the Natural and Built Environment Bill, it is however our submission that: amenity values are included and protected, Herenga ā Nuku Aotearoa are included as a consulted party under schedule 7, and geological and geomorphic processes are included under the definition of 'natural environment'.

If you have any questions about the above, please don't hesitate to contact us.

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