

Proposed Natural Resources Plan:

Submitter:

**Porirua Harbour and Catchment
Community Trust**

Submitter Number:

S33

Proposed Natural Resources Plan

Submission from the Porirua Harbour and Catchment Community Trust

General

The Trust supports most of provisions in the proposed plan. In particular, we strongly support and endorse the Whaitua process for the Porirua Harbour and Catchment, and we will make further submissions in due course on the detailed amendments resulting from that process.

Comments on Particular Provisions

3.4 - Natural Character

We strongly support Objective 018 –

“The ecological, recreational, mana whenua, and amenity values of estuaries including their sensitivity as low energy receiving environments are recognised, and their health and function is restored over time”

This objective is particularly important to the Porirua Harbour system

3.6 - Biodiversity, aquatic ecosystem health and mahinga kai

We strongly support Objective 025 and its components covering water quality, flows, water levels, and coastal and aquatic habitats; the restoration of aquatic system health and mahinga kai; and improvement in water body and coastal marine health.

We support this objective and its components as critical reference points from which policies and rules for the Porirua Harbour and catchment should be derived.

3.11 - Discharges

We submit that the wording used on Objectives 046 and 047 is weak and needs to be strengthened. It is not sufficient simply to just *reduce run off or leaching of contaminants or reduce sediment inflow or to reduce the amount of sediment laden run off*. We want to see some stronger language and targets such as those in the Porirua Harbour Strategy and Action Plan where Objective 1 is to *reduce sediment inputs to harbour and waterways to more natural levels* with a target of reducing sediment inputs by 50% by 2021, and sediment inputs to 1mm/year by 2031.

A related objective in the Porirua Harbour Strategy is *to significantly improve harbour water clarity and harbour flushing capacity*.

Objective O50 says *discharges of wastewater to fresh water are progressively reduced*. We submit that “reduced” should be changed to “eliminated”.

Policy 4.1 – Integrated Catchment Management

This is a critical policy. We would like to see P1 strengthened as follows:

Land and water resources shall be managed to:

- *Reflect te uta ki tai (which perhaps needs to have a translated definition showing it is a concept that, as we understand it, equates to integrated catchment management from the mountains to the sea);*

- *Improve and maintain the health of bio physical resources and systems and of catchment and aquatic processes.*

The following principles of integrated catchment management will be used:

a, b, c, d, e as already listed.

Policies P8 and P9 - Beneficial Activities, and Public Access

We strongly support the activities in this list but we consider that the inclusion of artworks (1) is a little out of place here and should be repositioned to Policy P9 (Public Access) – which we also strongly support.

Natural Form and Function – Policies P22, P23 and P 24

We strongly support these policies, especially P23 which includes *Restoring Te Awarua o Porirua Harbour*.

As mentioned in our comments on Objective 3.11, we consider the sub policies of managing activities to reduce sedimentation rates and pollutant inputs, managing erosion prone land and riparian margins, and undertaking planting and pest management programmes should have stronger supporting language such as:

- (a) *progressively reducing and maintaining minimal sedimentation and pollutant inputs,*
- (b) *managing erosion prone land and riparian margins to achieve (a) and*
- (c) *undertaking planting and pest management programmes in harbour and lake habitats and ecosystems to minimise ecological degradation and achieve measurable improvements in ecological health.*

Policy P31 – Biodiversity, Aquatic ecosystem health and mahinga kai

We strongly support these policies and sub policies and note that they use strong language such as minimise and avoid which, although taken from the RMA, could easily be used in other policies such as those mentioned above.

Policy P 37 – Values of Wetlands

This is a significant and important policy set for Te Awarua o Porirua and we strongly support it. However, all the sub policies appear to be equal. We consider the one relating to recreation should be made subsidiary to the other natural resources ones.

Policy P 65 – Minimising Effects of Nutrient Discharges

We strongly support this policy and its provisions.

4.8.2 – Discharges to Water

We strongly support Policies P67 (minimising effects of discharges) and P 68 (inappropriate discharges to water)

4.8.3 – Stormwater

We consider the adverse effects of stormwater (such as nutrient level increases, flushing sediment and contaminants) should be spelt out so it is clear what the sub policies will be targeted at. We also consider that sub policy (d) needs to be strengthened by linking the progressive improvement of stormwater and wastewater to measurable improvements in ecological health and harbour water quality (which would potentially add another dimension to the rules in Section 5.2.3).

4.8.5 – Earthworks and vegetation clearance and 4.8.6 – Livestock access and riparian management

We strongly support these policies.

4.9 – Taking, using, damming and diverting water

We question the application that, that as of right, 20,000 litres per day can be extracted from streams in the sensitive parts of the Porirua Harbour catchment. This is particularly so in the Horokiri Stream alongside Paekakariki Hill Road. We have had numerous anecdotal comments that the amount of water reaching the inlet was much less than it used to be – principally because of the explosion of lifestyle blocks which means that this catchment area has a growing number of houses, swimming pools and gardens that pump water from the stream regularly. Our concern is that this cumulative ‘take’ does not adversely affect the natural flushing of the inlet from its tributary streams. Each lifestyle block is accorded the same legal take as the farms that existed before subdivision (1970’s to 1980’s).

The plan states that Minimum Flows be maintained. We would like to know how this is decided for the Pauatahanui Inlet streams.

4.10.1 – Primary coastal policies

We strongly support the policies in this section, especially those relating to recreational values (P133), and public open space values (P134).

5.1.13 – Ground based and aerial spraying

We consider that what constitutes aerial spraying and what doesn't need to be clearly defined. There does not seem to be such a definition in the plan. For example, is spraying from a quad bike aerial spraying? The *Growsafe* requirements mentioned apply realistically to larger farms, but would not be applicable to the many smaller rural land uses in the Porirua Harbour and, particularly, the Pauatahanui Inlet catchments.

5.2.3 - Rules for Stormwater

We strongly support these as drafted but would like to see them extended by including a link to receiving water quality monitoring and standards.

5.4.3 – Livestock exclusion and 5.4.4 – Earthworks and vegetation clearance

We strongly support these rules but question how well they will work for catchments like those feeding the Pauatahanui Inlet. The Plan seems to have been built on the assumption that rural areas are large farms – which is no longer the case in most of the Porirua harbour catchment. No doubt the Whaitua process will address these issues, but in the meantime we would like to see some specific protections controlling the relatively intensive lifestyle land use, which has more septic tanks, more animals and more runoff of nutrients and wastewater, not to mention nutrient run off from land uses such as golf courses.

5.5.3 – Activities in wetlands and 5.5.4 – Activities in beds of lakes and rivers and 5.5.8 – Damming and diverting water

We strongly support these rules.

5.7.2 – Coastal management general conditions

We do not know the origin of these general conditions, and would like this to be made clear – perhaps by referencing it somewhere such as in Schedule N (i).

9 – Te Awarua o Porirua Whaitua

We would also like to know the origin and reasoning for the adoption of these policies.

Schedule A – Outstanding water bodies

We question whether “Pauatahanui Saltmarsh” and “Pauatahanui Tidal Flats” in Schedule A refer to the whole Inlet or just the area around the Pauatahanui Stream.

We consider that all the saltmarsh and tidal flats of the Pauatahanui Inlet should be included in Schedule A and, in order to make this explicit, we request that the wording in Schedule A be amended to specify:

- “Pauatahanui Inlet Saltmarsh” and
- “Pauatahanui Inlet Tidal Flats”.

