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## Supplementary Submission to GWRC NRP PC1 Hearings Committee on 15 April 2025 on behalf of Porirua Harbour and Catchments Community Trust (Porirua Harbour Trust)

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### 1. Position Statement

The original submission by Porirua Harbour Trust in December 2023 highlighted degradation of Te Awarua o Porirua and support for positive regulatory outcomes which include limits, target attribute states, and coastal water objectives providing clear direction for restoration of ecosystem health in Plan Change 1. The submission points are appended in tabular form – and clarification and emphasis will be given to those points.

### 2. Expected Outcomes of the GWRC Natural Resource Plan to Improve Degraded Environments

The current legislation gives guidance for the consideration of principles that provide outcomes for waterbodies that **the health and well-being of degraded water bodies and freshwater ecosystems is improved (NPS FM)** – and status quo and acceptance of a degraded state is not acceptable.

### 3. The Porirua Harbour Trust supports outcomes from the NRP that environments with current degraded ecological states are reversed, can recover and are improved (where practicable).

#### Recent Experiences and Observations

- A. Porirua Harbour is in a degraded and declining state. Research and monitoring consistently highlight environmental stressors requiring urgent action. Significant improvements are needed just to halt further decline. To restore the ecosystem, sediment inflow must be drastically reduced, as the harbour can no longer recover on its own.
- B. Continued sediment and pollutant input from urban areas and development such as Transmission Gully Construction – non-compliance incidents with pulses of sediment and contaminants entering the harbour.
- C. There has been considerable work undertaken by the Te Awarua-o-Porirua Whaitua Committee which resulted in the recommendations detailed in the Te Awarua-o-Porirua Whaitua Implementation Programme in April 2019. The recommendations provided a clear basis for changes to the NRP Regional Plan to reflect community values and expectations.

- D. The recent signing of Te Wai Ora o Porirua – Porirua Harbour Accord – is a commitment for the parties to the Accord – including Greater Wellington Regional Council – to follow through with plan changes that halt the degradation of the estuary and the harbour. This is required to maintain the integrity of the Council to the wider community and to the commitments made in the Accord.

It is noted that the conclusions made by the Porirua Harbour Trust in identifying issues, outcomes sought, and potential responses are well aligned to those noted in the submission dated 14 March 2025 by Te Rūnanga o Toa Rangatira (the mandated iwi authority for Ngāti Toa Rangatira).

**The community expects timely implementation of the Whaitua Committee’s recommendations, given the clear issues, actions, and timelines. The Porirua Harbour Trust strongly supports including these recommendations in Plan Change 1 to the NRP.**

#### **4. A Commitment to the Porirua Harbour Accord in the Natural Resource Plan**

The Porirua Harbour Accord is a partnership between Te Rūnanga o Toa Rangatira, GW Regional Council, Porirua and Wellington City Councils, and Wellington Water Ltd to restore the health of Te Awarua o Porirua. It supports the Porirua Whaitua Implementation Plan and the Ngāti Toa Rangatira Statement, providing a shared framework for prioritising actions, monitoring, and restoration. The Accord aims to align partners and stakeholders around a common vision and guide future measures and targets to improve the harbour.

#### **5. Targets Need to Be Set to Make Meaningful Improvements to Ecosystem Health**

The section 42A reports have considered the various submissions and are informed by the expert evidence which have looked at the targets and practicability of the measures, etc. As a result, a range of amendments are proposed which make refinements to the key objectives and targets.

**Porirua Harbour Trust are concerned that the 2040 target is being ‘watered down’.**  
**Key areas of concern include:**

- **Reduced sedimentation targets as part of coastal water objectives (Table 9.1).**  
The Section 42A report recommends reducing sedimentation rate 2040 targets from the notified version in Table 9.1 from 1mm/year to 2.7mm/year for the Onepoto Arm and from 2mm/year to 3.2mm/year. The total loads entering the harbour should be the focus rather than making the targets more permissive due to higher ‘natural accumulation’ than previously thought - which we have little control over. Accumulation from land use accumulation should potentially have even more stringent controls - which we do have some control over.

We are concerned reducing sedimentation targets will undermine the health and wellbeing of ecosystems and habitats of Porirua Harbour.

- **Lower enterococci targets for sites within the harbour.**

Table 9.2 amendments in the Section 42A report recommend lower E. coli targets, as original goals are now seen as 'unachievable' by 2040 – this is not supported and there should be greater efforts to achieve the original targets.

## **6. Porirua Harbour Trust supports the development of long-term vision targets but the progress to achieving the targets needs to be meaningful and funded accordingly.**

The Trust supports the following objectives:

- Objective P.O1 sets the long-term target of wai ora for Te Awarua o Porirua by 2100.
- Objective P.O2 provides a trajectory of improvement towards wai ora by 2040. The amendments to this objective include ecosystem health, natural form and character, riparian vegetation, and social and economic use benefits.
- Objective P.O3 involves coastal water quality and the health and well-being of ecosystems for Te Awarua-o-Porirua and the open coast.
- Objective P.O6 sets target attribute states for rivers' water quality, habitats, natural form, water quantity, and ecological processes.

**Porirua Harbour Trust supports adding clause (e), which clarifies the need to improve wastewater and stormwater networks and links activity assessments to achieving these targets when policies aren't met.**

- The suggested reduced ambition for lowering the targets for E.coli and sedimentation is offset by new Objective P.O7, aiming for no further decline in river health by 2030. However, PC1 lacks detail on what "no further decline" actually entails.

## **7. Timeframes must contain interim and measurable milestones (including five yearly reporting)**

**The Porirua Harbour Trust supports retention of the dates recommended by the Whaitua Committee rather than pushing out the dates of achieving an improved attribute state by decades.**

**The Porirua Harbour Trust has an expectation to meet the target attribute states of water quality by 2040 and any delay will mean that the community will have to (and continued risk of having to) continue living with an increasingly**

degraded environment. Further, the longer this degraded environment continues, the more costly its rehabilitation will be.

## 8. Affordability and Achievability

Targets should be set according to community values and expectations of outcomes.

There is evidence provided in the Section 42A that questions the 'affordability' of making improvements to discharges entering Porirua Harbour in the proposed timeframe. This type of economic argument should not be used as a reason for inaction. Even if this creates an uncomfortable position for TLAs it is their responsibility to find solutions.

In the recent High Court declarations sought by South Island iwi Ngāi Tahu - Bryan Smith – *who was appointed chief adviser of freshwater at the ministry (MfE) in late 2017, to oversee the coalition government's freshwater policies* - gave evidence before Justice Melanie Harland on 17 March 2025. Smith said regulations compelled councils "to make decisions about contaminants to the best of their ability with the information and science available".

Chris Finlayson KC cross-examined Smith and referred to minutes (taken by the Ministry for the Environment) of a meeting of the Māori freshwater forum, known as Kāhui Wai Māori held in November 2018 – and the forum concluded that "this is a crisis, and the responses need to reflect that."

Finlayson then referred to Smith's distinguished career in work for the Canterbury Earthquake Recovery Authority – and it was confirmed that the post-quake reconstruction and recovery work was extremely complex.

***Finlayson said, was the Canterbury disaster showed what was possible if the Crown moved very quickly to solve complex issues.***

***"It can happen, yes," Smith said.***

***"If there's a will?" asked Finlayson.***

***Smith: "If there's an imperative, yes."***

(From Newsroom 17/3/2025 by David Williams.)

## CONCLUSION:

### Porirua Harbour Trust - Expectations:

1. The degraded ecosystems of the Te Awarua Porirua Harbour and the catchments that flow into the harbour **MUST** be improved.
2. **The actions to improve the ecosystem health are undertaken with haste – with long-term achievement of attribute targets by 2040.**
3. **That the community is engaged and kept informed of the progress made with regular transparent reporting.**
4. **The changes required to the Natural Resource Plan by PC1 must retain the confidence of the community and integrity of all the processes GWRC have sponsored.**

This includes following through those intentions with actions:

- The Whaitua Committee process sponsored by GWRC, **MUST** implement the recommended suite plan changes in the NRP and are not watered down.
  - The development of Te Awarua-o-Porirua Harbour and Catchment Strategy and Action Plans are complemented by a regulatory framework.
  - The Porirua Harbour Accord establishes a clear commitment of GWRC to implement changes to that support the improvement of ecosystem health in Porirua Harbour.
5. There is also an expectation that the implementation of actions that result from these plan changes will be appropriately resourced and funded – and not be an excuse for inaction.

## About the Porirua Harbour Trust

### A. Te Awarua-o-Porirua Harbour and Catchments Community Trust (Porirua Harbour Trust)

The Te Awarua-o-Porirua Harbour and Catchments Community Trust is an independent entity with a role of monitoring and advocating for the sustainable management and environmental health of the Porirua Harbour and catchments.

The Objectives of the Porirua Harbour Trust (PHACCT) are to promote the sustainable management of the Porirua Harbour and its catchment by:

- a. Advocating for the sustainable management of the harbour's ecosystem and its catchments; Fostering the understanding of ecological and environmental issues associated with the harbour and its catchments through education and community awareness;
- b. Co-ordinating input from community groups on issues relating to the harbour and its catchments;
- c. Supporting, promoting and contributing to programmes and projects aimed at improvements to the Porirua Harbour ecosystem and its catchments;
- d. Fostering an understanding that the rural and urban areas around the harbour have specific needs; and
- e. Engaging in any other activities and processes that are complementary to any of the foregoing objectives including to promote or undertake research.

### B. Porirua Harbour and Catchments – The Area of Interest

The Te Awarua-o-Porirua Harbour, comprising the Onepoto Arm and the Pauatahanui Inlet and the outer harbour, and its contributing catchments (~19,000 ha.) provides a range of significant values to the wider Wellington region. The harbour contains the largest estuary system (11% intertidal with narrow opening) in the lower North Island, and has high importance for wildlife habitat, cultural, recreational, and economic values. The whole harbour forms one inter-related, interdependent ecosystem.