

Submission Points for Hearing Streams – GWRC Natural Resource Plan – Plan Change 1 Porirua Harbour Trust and GOPI

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested	Hearing Stream
S176.001	General comments	General comments - overall	Support	Submitter supports incorporating the appropriate Whaitua Committee's recommendations into PC1 to the NRP as proposed.	Seeks PC1 should address issues to restore degraded and degrading ecosystems. Integrate PC1 with the related functions and initiatives from the respective statutory agencies, including GWRC, Porirua and Wellington City Councils and Wellington Water as current water managers.	Two
S176.002	General comments	General comments - target attribute states	Support	<p>Notes long-term target attribute timeframes require interim target attribute state timeframes set for intervals of not more than 10 years with baselines which need to be achieved by the interim target date set. Acknowledges outcomes sought from actions to improve ecosystem health will be a long-term prospect. But notes timeframes should not be arbitrarily set several decades in the future and must include interim and measurable milestones (such as five yearly intervals) in achieving the ultimate goal by 2040. Considers there must be a regular critique of the actions being implemented to ensure they are effective.</p> <p>Notes expectation to meet the target attribute states of water quality by 2040 and any delay will mean the community will have to (and continued risk of having to) continue living with an increasingly degraded environment and increased rehabilitation costs as a result. Notes need to establish meaningful and robust environmental limits through the inclusion of the limits recommended by the Whaitua Committee in 2019 .</p> <p>Supports the long-term goal of improvement to target attribute state. Notes Target Attribute</p>	<p>Timeframes must contain interim and measurable milestones (including five yearly reporting).</p> <p>Retention of dates recommended by Whaitua Committee rather than pushing out the dates of achieving an improved attribute state by decades. Ensure the environmental limits are set to achieve "ecological health" and other associated values such as recreation, amenity, and custodianship.</p>	Three

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				<p>States need to be set to allow maintenance and/or restoration of this level of ecosystem health, which in cases will likely involve setting limits and bottom lines well above the national bottom lines. Considers all waterbodies, not just rivers and streams, should have set Target Attribute States, this includes estuaries, wetlands, and groundwater.</p> <p>Considers a functional NRP requires objectives, policies, methods, rules, timelines and dates that are robust and scientifically based to succeed in restoring health to degraded waterbodies. Notes the NRP needs to provide clear guidance as to how these will be incorporated into existing and future resource consents, and this is also applicable to developing resource consent conditions that allow for unambiguous enforcement options while undertaking compliance function of the Regional Council.</p>		
S176.003	12 Schedules	Schedule 27: Freshwater Action Plan requirements.	Support	<p>Supports requirement to develop Freshwater Action Plans.</p> <p>Supports approach of developing Freshwater Action Plans which protect, maintain, or enhance macroinvertebrate, periphyton, and fish abundance and community attributes as necessary and where applicable, where these communities also include life stage habitat protection actions for all species.</p> <p>Notes need to develop Freshwater Action Plans for urban catchments.</p>	Retain requirement for Freshwater Action Plans	Four
S176.004	6 Other methods	Method M36: Freshwater	Support	Supports requirement to develop Freshwater Action Plans.	Retain requirement for Freshwater Action Plans	Four

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		Action Plan programme.		<p>Supports approach of developing Freshwater Action Plans which protect, maintain, or enhance macroinvertebrate, periphyton, and fish abundance and community attributes as necessary and where applicable, where these communities also include life stage habitat protection actions for all species.</p> <p>Notes need to develop Freshwater Action Plans for urban catchments.</p>		
S176.005	General comments	General comments - overall	Amend	<p>Considers there needs to be a focus on key contributors to contaminant loading in the harbour, including sedimentation, nitrogen, phosphorus, and bacterial (E. coli), and there is a need for urgent actions to address these environmental stressors that are driving degradation of waterbodies and harbour.</p> <p>Considers an approach to prioritise actions to improve ecosystem health can be modelled to ensure the key actions are prioritised and an evaluation can be made for potential improvements in estuary health arising from diversion of wastewater from an estuary, and estimating catchment diffuse nutrient load reductions required to meet estuary health objectives.</p> <p>Considers a focus on key contributors could provide potential leverage to increase the prioritisation of central government funding for cleaning up water bodies by highlighting the urgency of action. Considers a do-nothing approach is not an option and references the</p>	Suggests that PC1 policies related to stormwater discharge require demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied.	Two

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				<p>extent and health of eel grass (<i>Zostera muelleri</i>) beds has been reduced over many decades in Porirua Harbour, and sediment inputs into waterways from earthworks from new urban development (subdivision), land use, and forestry must be avoided or tightly controlled to allow freshwater and coastal receiving environments to be restored to a state of health and wellbeing.</p> <p>Considers rules and methods should focus on avoiding activities which contribute the most sediment from construction, subdivision development and forestry as the effects of these activities are seldom mitigated and never remedied. Considers the policies governing adverse effects of stormwater discharges (e.g., Policy P.P10, Policy WH. P10) contain clauses giving reasons to not put good management practices into effect. This is not supported in current form.</p> <p>When discussing adverse environmental impacts of stormwater or wastewater discharges, it is also required to actively consider ecosystem health - this requires a demonstration of a functional need for that activity, and if there is a functional need, then the effects management hierarchy must be applied. This should be referred to in the PC1 GWRC NRP</p>		
S176.006	General comments	General comments - consultation	Amend	Supports inclusion of a method that provides for meaningful community engagement. Considers this would define requirements for structures and processes that enable communities to	Include a method related to community engagement to ensure updates on progress of implementation are carried out - and actions are not deferred due to arguments of economic affordability or feasibility.	

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				participate in all issues in advocating for environmental guardianship.		
S176.007	5.4 Beds of lakes and rivers	Rule R151A: Ongoing diversion of a river - permitted activity.	Amend	Considers Rule 5.4.8 should be a discretionary activity to provide fish passage over artificial barriers such as dams even for those that have existed for 10 years or more - rather than reverting to permitted activity status. Considers if these are consented using permitted activity status, this will authorise a past decision which leaves a negative legacy and does not address the issues around fish passage that remain.	Make Rule R151A a discretionary activity	One
S176.008	General comments	General comments - overall	Not Stated	Expects the implementation of actions that result from plan changes will be appropriately resourced and funded.	Not stated.	Two
S176.009	General comments	General comments - water bodies	Support	Supports rules and methods that provide for, or encourage, increasing the extent of wetland habitat in the rural landscape and in the river/stream corridors.	Clarify and strengthen rules and methods to support actions to increase wetland habitat.	One
S176.010	6 Other methods	Method M43: Supporting the health of urban waterbodies.	Support	Supports Methods M43 and M45 to support the health of, and funding for, urban waterbodies, particularly in relation to stormwater discharges - and considers this needs to be considered by the City Councils when assessing improving existing urban sites or urban development projects.	Not stated.	Two
S176.011	6 Other methods	Method M44: Supporting the health of	Support	Supports Method M44 to support health of rural water bodies. Notes in order for rural landowners to retire pasture and undertake protective fencing of vegetation, especially on high erosion	Seeks the following be implemented: (a) investigate financial support and rates relief options for accelerating retirement/revegetation of pastoral and plantation forestry land uses, and (b)	Three

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		rural waterbodies.		prone slopes, there must be a sufficient quid-pro quo for landowners by way of incentives and financial relief. Does not support local authority suggestions that lower valuations of land and therefore lower rates are already baked in to rating formulas and sufficient to compensate landowners for "doing the right thing" for the environment.	support the effective uptake and implementation of Farm Environment Plans, and (c) promote uptake of good management practice in rural land uses, including for pastoral farming and plantation forestry, and (d) develop and deliver a specific programme of engagement and education with small (<20ha) landowners.	
S176.012	6 Other methods	Method M45: Funding of wastewater and stormwater network upgrades	Support	Supports Methods M43 and M45 to support the health of, and funding for, urban waterbodies, particularly in relation to stormwater discharges - and considers this needs to be considered by the City Councils when assessing improving existing urban sites or urban development projects.	Not stated.	Two
S176.013	9 Te Awarua-o-Porirua Whaitua	Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion.	Support	Notes PC1 includes strong provisions (such as Policy P.P22) to reduce sediment discharges from farming activities on land with a high risk of erosion. Supports the measures proposed in P.P22 which will deliver farm management plans and risk erosion plans but notes implementing these can be costly to landowners and suggests support is needed for both risk erosion and farm management plans.	Not stated.	Three