



GUARDIANS OF PĀUATAHANUI INLET

Date: 13 November 2020

To: Porirua City Council

From: Te Awa-o-Porirua Catchment and Community Trust and
The Guardians of Pāuatahanui Inlet

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Submission: PCC Proposed District Plan

Introduction

We note that, in the foreword, the Mayor says:

“This Plan (plans for the future) by recognising the many and various inputs necessary to provide for the wellbeing of the natural environment and the special status of tangata whenua.”

She also says:

“This Plan marks an important milestone in the history of the City and comes at a time when housing choices are wider than ever before, care for the environment is set on a much clearer trajectory than previously with the effects of climate change becoming ever more apparent, and the building of relationships across the city grows stronger with increasing ethnic diversity.”

We strongly support these sentiments, especially care for the environment as it relates to the protection and enhancement of the harbour, its ecosystems and those of its contributing catchment. If the harbour and its catchment are protected and enhanced, then this will be a significant contribution to care for the environment.

Note

This submission proposes amendments to various objectives and policies. Amendments are set out *in italics*, and deletions are identified through ~~strike-outs~~. The submission is set out in the order the various sections appear in the Plan.

Definitions

We note that the term “natural environment” is used in the plan but is not defined - although “environment” and “natural and physical resources” are defined using the RMA definitions.

We submit that a definition of natural environment should be developed and used, and suggest the following:

“Natural environment means terrestrial, fresh water and marine ecosystems and their constituent parts, particularly native biota (the animal and plant life of a particular habitat) and related amenity values”

EP Eastern Porirua

Redevelopment in eastern Porirua offers a significant opportunity to remedy failing and inadequate stormwater systems. We consider this needs to be recognised in the Strategic Objective for this redevelopment as follows:

EP - O1 Eastern Porirua Regeneration.

The regeneration of Eastern Porirua occurs in a comprehensive manner that enables the co-ordinated development of housing, local centres, transport, infrastructure and the provision of open space, and results in a high quality urban form and improved social, cultural and economic wellbeing *and a storm and wastewater system that avoids any adverse effects and contributes to positive effects on the natural environment including the surrounding catchment and the harbour.*

HO Housing Opportunities

HO - O2

We note that the objectives for increased housing density do not mention any adverse effects such developments might have on the natural environment or the catchment or harbour.

We submit that HO-O2 should have a further listed provision as follows:

“Higher density housing is enabled on greenfield and brownfield sites across the city where it:

1. Has access to the transport network and is served by multi-modal transport options;

2. Is located within or near a commercial centre and close to public open space;
3. Has access to social infrastructure;
4. Avoids areas of significant natural hazard risk;
5. *Avoids any adverse effects and contributes to positive effects on the natural environment including the surrounding catchment and the harbour.*

NE Natural Environment

We note and strongly support the introductory statement in the Natural Environment Chapter that:

“ Te Awarua-o-Porirua Harbour contributes significantly to the City’s identity and is highly valued but suffers from poor water quality. Porirua City Council, Wellington City Council, Wellington Regional Council, Ngāti Toa Rangatira and the community have a shared responsibility for improving water quality and the health of the Harbour and catchment. The District Plan aims to assist the Regional Council achieve its objectives of improving water quality in the Porirua Catchment, while recognising that the control of land use for the purpose of maintaining and enhancing water quality is a regional council function.”

We support all the four objectives in this section and, in particular:

NE - O3 - Preventing further degradation of Te Awarua-o-Porirua Harbour

However, we submit that this objective should be amended as follows:

Subdivision, use and development does not contribute to any further degradation of Te Awarua-o-Porirua Harbour and its catchment *and measures are implemented to enhance the quality of all receiving water that enters the harbour.*

NE O4 - The health and wellbeing of Te Awarua-O-Porirua Harbour is maintained and protected and, where possible, enhanced.

We strongly support this objective, especially the objective of enhancement.

Natural Character

NATC O1 Protecting, Preserving and Enhancing Natural Character

We submit that this objective should be amended as follows:

The natural character of coastal margins and riparian margins are preserved, enhanced ~~where appropriate~~ *wherever practicable*, and protected from ~~inappropriate~~ *all adverse effects* from subdivision, use and development.

We support the four policies but submit that:

NATC - P3 should be amended as follows:

Allow for small-scale earthworks in coastal margins and riparian margins *only where they have no adverse effects on the harbour and its contributing catchment and where the natural character values and ecological condition of the harbour is maintained and, preferably, enhanced.*

ECO Ecosystems and Indigenous Biodiversity

We support all the objectives and policies in this section but submit that ECO - P7 should be amended as follows:

ECO - P7 Protection and Restoration Activities

Encourage the protection and restoration of indigenous biodiversity by supporting initiatives by landowners, community groups and others to protect, restore and maintain areas of indigenous vegetation, *especially riparian areas and wetlands, including contributing seeps to wetlands.*

And we submit that ECO - P11 should be amended, as followed:

ECO - P11 Earthworks within Significant Natural Areas

Only allow earthworks within a Significant Natural Area where it can be demonstrated that:

1. Any adverse effects on identified indigenous biodiversity values of a Significant Natural Area listed in [SCHED7 - Significant Natural Areas](#) are addressed in accordance with [ECO-P2](#) and the matters in [ECO-P4](#) and [ECO-P12](#);
2. Any biodiversity offsetting proposed is in accordance with [APP8 - Biodiversity Offsetting](#); and
3. Any earthworks within a wetland, *or that adversely affect riparian areas or contributing seeps to a wetland*, are avoided

Natural Character

We support the objective and policies in this section but submit that NATC-O1 should be amended as follows:

NATC - Protecting, Preserving and Enhancing Natural Character

The natural character of coastal margins and riparian margins are preserved, and enhanced ~~where appropriate~~ *wherever practicable*, and protected from inappropriate subdivision, use and development *and any adverse effects caused by subdivision, use and development on any part of the harbour and its contributing catchment.*

NFL - P3

We submit that it is inappropriate to require the maintenance of the pasture landscape in the Kakaho Special Amenity Landscape - SAL 006 (Natural Sciences Item 3). Pasture and its management can contribute to adverse effects on the sensitive Kakaho riparian area and the

ecologically valuable estuarine and coastal environment at the mouth of the Kakaho stream. In the 2016 storm event huge amounts of sediment came down the Kakaho valley. Its landscape needs to be protected from the risks of further such events. We also submit that the upper Kakaho is far from being a “predominantly unmodified landform” (Natural Sciences Item 2)- it was once forested and that should ideally be the state it eventually returns to.

We submit that the Kakaho Special Amenity Landscape should be deleted or that any references to preserving a pasture landscape should be removed.

The features of this landscape area are set out in Schedule 10, SAL 006 of the Plan as follows:

Natural Sciences

1. Highly representative of open rolling landform characteristic of much of Porirua’s rural hinterland;
2. Predominantly unmodified landform;
3. Primarily managed as pasture with low ecological value;
4. Indigenous revegetation in a number of gullies identified as Significant Natural Areas.

Sensory

1. Landform remains largely open and intact with few incongruous elements; minor farm tracks, pylons and a single block of exotic forest;
2. Folded landform creates a vivid ‘rumpled blanket’ effect which remains highly visible from State Highway 1 at the Paremata Road Bridge and large areas of Porirua’s existing northern residential areas;
3. Despite extensive pastoral use, landform remains relatively natural with limited modification;
4. Distinctive valleys and open rolling tops highlight bold changes in shadow and light.

Shared and recognised

1. Contained inland forested areas with important resources for Māori and associated with Pā and mahinga kai at Taupo;
2. Provides a highly recognisable local backdrop, visible from State Highway 1 and residential areas to the south of Pāuatahanui Inlet between Paremata and Whitby;
3. Changing light on the hills and through the seasons are often the subject depicted in paintings and are frequently photographed as part of the backdrop to Pāuatahanui Inlet.

REE - Resilience, Efficiency and Energy

We wonder how, in REE O5 “the environment’s needs” might be interpreted. We submit that this objective should be amended as follows:

REE - O5 Resource Efficiency

Porirua’s natural and physical resources are used efficiently, meet the community’s needs both now and in the future and, *in doing so, protect Porirua’s natural environmental values and have no adverse effects on the function or ecology of the harbour and its contributing catchment.*

Strategic Objectives - Rural Environment

We are concerned that the apparent emphasis on retaining a rural character might be interpreted as retaining a pastoral landscape. If this is the case, then maintenance of such a landscape could have adverse effects on the harbour. Further, it is questionable as to how much of the rural environment can be productive - whatever that means.

We submit that RE- O1 should be amended as follows:

Porirua has a ~~productive~~ rural environment that:

1. Contributes to the City's social and economic wellbeing;
2. Retains its ~~rural~~ *non-urban* character; and
3. Provides an open ~~rural~~ backdrop to the City.

Strategic Objectives - Urban Form and Development

We note that these objectives do not mention anything related to the environment and managing adverse effects on the catchment and harbour.

We submit that UFD - O5 should be amended as follows:

UFD - O5 Subdivision, use and development

Subdivision, use and development is integrated with the transport network, supports Porirua's current and future needs, *protects Porirua's natural environmental values and has no adverse effects on the function or ecology of the harbour and its contributing catchment.*

Strategic Objectives: Infrastructure

We note that while INF - P4 provides a policy to ensure infrastructure minimises adverse effects on the environment, there is no objective that mentions environment or environmental values.

Accordingly, we submit that INF O5 should be amended as follows:

INF - O5 Providing for Infrastructure

Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, and upgraded efficiently, securely and sustainably, while the adverse effects of infrastructure are avoided, remedied or mitigated, including effects on:

1. The anticipated character and amenity values of the relevant zone;
2. The identified values and qualities of any Overlay; ~~and~~
3. The change in risk to people's lives and damage to adjacent property and other infrastructure from natural hazards; *and*
4. *The environment (as defined in the plan), including the harbour and its contributing catchments.*

THWT Three Waters

We submit that hydraulic neutrality, while a desirable start in better managing stormwater, is not sufficient to protect the harbour from excess amounts of stormwater and related sediment and contaminants. Instead we submit that **water positivity** should instead replace hydraulic neutrality. This can be defined as:

Net water positivity means that post development peak run off is less than pre-development peak flow rate, achieved by use of requirements for on-site water management mechanisms such as stormwater collection/surge tanks of at least 10,000 litres per household and business, re use of this water on site for non-potable uses such as garden watering and other outdoor uses, and perhaps toilet flushing, limits on impervious surfaces, use of swales instead of gutters for roads, and use of managed wetland treatment systems that discharge high quality contaminant free water.

Accordingly, we submit that THWT - O1, be amended as follows:

THWT - O1

There is no increase in demand on stormwater management systems and a *decrease* in flooding from development *and redevelopment* within Urban zones, Settlement Zone and the Māori Purpose Zone (Hongoeke)

Accordingly, we correspondingly also submit that THWT - P1 be amended as follows:

Enable new development *and any redevelopment* in Urban zones, Settlement Zone and the Māori Purpose Zone (Hongoeke) only where it achieves *or contributes to water positivity (defined as above or equivalent)*

CE Coastal Environment

We submit that the protection of the coastal environment should extend beyond simply protection from inappropriate development. Accordingly, we submit that CE-O1 should be amended as follows:

CE-O1 Natural Character of the coastal environment

The natural character of the coastal environment is preserved and protected from inappropriate subdivision, use and development *and from adverse effects, especially sediment and contaminants, arising from subdivision, use and development.*
