



Ā UPANE KA UPANE WHITI TE RA

14 March 2025

Natural Resources Plan, Plan Change 1
Greater Wellington Regional Council
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Statement of Te Rūnanga o Toa Rangatira - Proposed Plan Change 1 to the Natural Resources Plan - Hearing Stream Two

Te Rūnanga o Toa Rangatira is a submitter to Natural Resources Plan, Plan Change 1 (submitter # 216).

The forthcoming Hearing Stream 2 (Objectives and Ecosystem health policies) for Proposed Plan Change 1 (PC1) to the Natural Resources Plan (NRP) is scheduled to commence on 7 April 2025.

Te Rūnanga o Toa Rangatira will appear at Hearing Stream Two on Thursday 10 April. This statement provides our initial comments on the proposed changes to PC1 as outlined in the section 42A Reports relating to the Objectives and Ecosystem Health and Water Quality Policies (28 February 2025).

Te Rūnanga o Toa Rangatira is the mandated iwi authority for Ngāti Toa Rangatira (Ngāti Toa). Te Rūnanga o Toa Rangatira has the responsibility for protecting and enhancing the mana of Ngāti Toa across the various political, economic, social, and environmental spheres. In relation to Te Ao Tūroa, the objective of Ngāti Toa is to nurture a resilient environment to sustain future generations through reclaimed connection and mātauranga to natural resources, empowering kaitiaki who are leaders and co-managers of our natural environment, our commitment to environmental sustainability and our ability to adapt to the impacts of climate change.

The original submission of Te Rūnanga o Toa Rangatira supported PC1 and raised matters relating to Te Awarua o Porirua (Porirua Harbour) and Te Whanganui a Tara (Wellington Harbour) Whaitua, Māori rights and interests in freshwater, mahinga kai, wai ora, aquatic ecosystem health, and regulating stormwater discharges in relation to unplanned greenfield development.

This statement follows our oral submission at Hearing Stream 1 which highlighted degradation of Te Awarua o Porirua and Te Whanganui a Tara and support for positive regulatory outcomes which include limits, target attribute states, and coastal water objectives providing clear direction for restoration of mauri and cultural health in PC 1.



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Te Wai Ora o Porirua - Porirua Harbour Accord

We celebrated the signing of Te Wai Ora o Porirua (the Porirua Harbour Accord) at Takapūwāhia Marae on 6 February 2025 (see attached Porirua Harbour Accord document). The Porirua Harbour Accord is a collaborative initiative of Te Rūnanga o Toa Rangatira, Greater Wellington Regional Council, Porirua City Council, Wellington City Council, and Wellington Water Ltd to work together to restore the health of Te Awarua o Porirua.

The Porirua Harbour Accord is intended to assist the realisation of the Porirua Whaitua Implementation Plan and the Ngāti Toa Rangatira Statement. It provides partners, stakeholders, community groups, and other organisations with a shared focus to prioritise actions that will improve the health of the harbour and to work in partnership to achieve a shared vision.

The purpose of the Porirua Harbour Accord is to establish an agreed approach including actions to improve the health of the harbour alongside establishing work programmes that deliver these improvements. The anticipated work programme will involve monitoring and restoration and will assist in the establishment of new or revised measures and targets in the future.

On 5 March 2025, a Harbour Summit was held at Takapūwāhia Marae as a follow-up to the signing of the Porirua Harbour Accord. This Summit involved a wide range of agencies and stakeholders and provided a forum to explore three critical questions:

- What can we do to contribute to a healthy and thriving harbour?
- What is our shared understanding of what success looks like?
- What is our collective or individual contribution to this success?

Going forward, the partners to the Porirua Harbour Accord are working on a catchment action plan which will aim to achieve a material and positive change to the environmental health of Te Awarua o Porirua to create a healthy and thriving harbour.

At Hearing Stream One on Monday 4 November 2024, we were asked about the development of a cultural health monitoring programme for Te Awarua o Porirua in collaboration with the Institute of Environmental Science and Research (ESR), Greater Wellington Regional Council, and Te Herenga Waka - Victoria University of Wellington. This programme includes kaitiaki monitoring of freshwater and harbour water at key mahinga kai sites using a network of passive samplers, as well as research into micro plastics and other risks to the health of the harbour. Russleigh Parai from Ngāti Toa and ESR will be providing a brief overview of the programme for the hearing panel.



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Objectives and targets for Te Awarua o Porirua

Plan Change 1 sets an objective to achieve a state of wai ora for Te Awarua o Porirua by 2100 (Objective P.O1). Further, the plan change sets a 2040 target which means that Te Awarua o Porirua is on a trajectory of measurable improvement towards wai ora (Objective P.O2). Te Rūnanga o Toa Rangatira submitted in support of these key objectives.

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.

Overall, Te Rūnanga o Toa Rangatira is supportive of many of the proposed amendments and the retention of the 2100 and 2040 objectives outlined in P.O1 and P.O2. These objectives originated from Te Awarua o Porirua Whaitua Implementation Programme and the Ngāti Toa Statement of 2019. It was the primary recommendations of these statements that the Proposed NRP plan be amended to include the 2040 target. Now in 2025, we continue to stand behind the target and the level of ambition required by all agencies. Pushing out the timeframes will only 'kick the can further down the road', shifting costs to future generations and delay the restoration of Te Awarua o Porirua.

However, as outlined below, we are concerned that the 2040 target is being 'watered down' which will place the restoration of significant sites for Ngāti Toa at risk and continued degradation. While there is continued uncertainty about the science, this is not a reason for inaction. Key areas of concern include:

- Reduced sedimentation targets as part of coastal water objectives (Table 9.1).
- Lower enterococci targets for sites within the harbour: Waka Ama, Rowing Club and Water Ski Club (Table 9.1A).
- Lower *E.coli* targets at Taupō Stream, Horokiri Stream and Waiohata (Duck Creek) and Te Kenepuru Stream (Porirua Stream) Table 9.2.
- Removal of Table 9.3 – contaminant load reductions.

We also submit the need for dedicated targets and methods to achieve the diversity, abundance and condition of mahinga kai, access to the foreshore and natural form and character including an increase in indigenous riparian vegetation along the margins of Te Awarua o Porirua.



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Specific comments on the proposed section 42A amendments

Objectives in relation to Te Awarua o Porirua

1. Objective P.O1

- a. Te Rūnanga o Toa Rangatira supports objective P.O1 and the target of wai ora for Te Awarua o Porirua by 2100.
- b. The explanation of wai ora is amended to clarify the values of Ngāti Toa in relation to practices and tikanga, restoration of mauri where possible, natural river flow and the social and economic use benefits of water.
- c. Overall, we are supportive of the proposed amendments which sets out an explanation of wai ora and what is required to achieve progressive implementation to support the cultural wellbeing of Ngāti Toa.

2. Objective P.O2

- a. Objective P.O2 provides a trajectory of improvement towards wai ora by 2040. The amendments to this objective involve ecosystem health, natural form and character, riparian vegetation, mahinga kai and customary use and social and economic use benefits.
- b. In relation to the proposed removal of the huanga of mahinga kai and Māori customary use for locations identified in Schedule B (clause e), we agree that this clause is a duplication of aspects of clause (d) and is limited by the list of places in Schedule B (Ngā Taonga Nui a Kiwia). We are, therefore, comfortable with the proposed changes to Objective P.O2.
- c. Objective P.O2 provides for the maintenance of natural form and character, including an increase in indigenous riparian vegetation. Currently the margins of Te Awarua o Porirua are dominated by reclamations, roads and the North Island Main Trunk Railway meaning it is devoid of a natural form and character and indigenous riparian vegetation is largely absent. We submit that the plan should contain dedicated targets to achieve natural form and character and indigenous riparian vegetation while noting this will require a range of statutory and non-statutory methods.

3. Objective P.O3

- a. Objective P.O3 involves coastal water quality and the health and well-being of ecosystems for Te Awarua o Porirua and the open coast.
- b. It has been proposed that clause (g) be removed and be incorporated into clause (h). Clause (g) relates to mana whenua



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being able to connect and access the coastal marine area and practice customary and cultural tikanga. There are also additional provisions relating to coastal areas not covered by Table 9.1. These amendments are generally supported by Te Rūnanga o Toa Rangatira.

- c. In terms of the coastal water objectives on Table 9.1, the notified version of PC 1 sets the 2040, 5-year mean sedimentation rate for Onepoto Arm at 1 and Pāuatahanui Arm at 2 (mm/year). These targets have now been reduced to 2.7 (Onepoto Arm) and 3.2 (Pāuatahanui Arm). This change reflects improved research about the current state of sedimentation within the harbour and natural accumulation. We are seeking an explanation for these changes and the rationale. We are concerned reduced sedimentation targets will undermine the health and wellbeing of ecosystems and habitats of Te Awarua Porirua.
- d. The targets for enterococci have also been amended, as shown in Table 9.1A (see below), due to concerns about achievability at certain sites. The identified sites for Te Awarua o Porirua are the Waka Ama area, Paremata Bridge, the Rowing Club, and the Water Ski Club. While it would have been helpful to have a map of these sites, we understand that the locations are:
 - i. Waka Ama – This is adjacent to the Whare Waka on Wi Neera Drive, Porirua.
 - ii. The Rowing Club is adjacent to the Porirua Rowing Club at Kahotea (Onepoto Road).
 - iii. Paremata Bridge, Paremata.
 - iv. Water Ski Club, Pascoe Avenue (near Camborne).
- e. A reduced target has been recommended for these sites (excluding Paremata Bridge) to achieve a 50% improvement by 2040 towards meeting 500 enterococci, which is considered suitable for swimming. We understand that for the Waka Ama site it works out to be an enterococci 2040 target of 1,090 (2680 – 500 divided by 2).
- f. It would be helpful for the plan to include a ‘plain-English’ explanation of these targets and how they are calculated.
- g. The four harbour sites within Table 9.1A are all mahinga kai, tauranga waka and significant for Ngāti Toa. The Whare Waka, in particular, is located on the harbour frontage of Takapūwāhia Marae and was originally a highly important site for gathering of shellfish. It is also the launching site of the Ngāti Toa waka taua, the waka ama club, children’s playground and coastal walkway.



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- h. We are gravely concerned that the enterococci 2040 targets for the Waka Ama, Rowing Club and Water Ski Club sites on Table 9.1A within Te Awarua o Porirua are set too low. The significance of these sites within the harbour should translate into a greater commitment to address environmental degradation, not lower standards or targets.
- i. Considering the significance of these harbour sites and the importance of achieving a swimmable water quality, we suggest having a two-tier target with an interim target for 2040 and another for 2050.

Table 9.1A: Coastal water objectives - enterococci

Site	Current state ¹	Target ²
<i>Te Awarua-o-Porirua Harbour</i>		
Waka Ama	2680	500-50% improvement towards meeting 500
Rowing Club	1820	500-50% improvement towards meeting 500
Paremata Bridge	378	200-500
Water Ski Club	1083	500-50% improvement towards meeting 500
<i>Open Coast</i>		
Karehana Bay at Cluny Road	408	M 500
Plymerton Beach at Bath Street	628	M 500
Plymerton at South Beach	738	M 500
Titahi Bay at Bay Drive	293	M 200
Titahi Bay at Toms Road	218	M 200
Titahi Bay at South Beach Access Road	458	M 500
<i>Any other locations</i>		
No monitoring sites	-	M

¹ As at 17 December 2024, 5-year summer 95th %ile Cfu/100 ml
² Cfu/100 ml 95th %ile
 M = Maintain; Maintenance in the state of a target will be assessed through:

- Benchmarking against the baseline threshold and trend analysis or appropriate statistical analysis; and
- Taking the impact of climate and human activity into account.

- j. P.O3 includes the objective that ‘the diversity, abundance and condition of mahinga kai has increased so that mana whenua access to healthy mahinga kai has increased.’ Further, the objective provides for ‘safe’ use of the coastal marine area for a wide range of activities, including Māori customary use.
- k. This objective will require an assessment of the cultural health of mahinga kai by Ngāti Toa in addition to the other associated measures outlined in PC 1. Our continuing work with ESR, Greater Wellington Regional Council and Te Herenga Waka/Victoria University of Wellington to be presented at Hearing Stream Two will be of critical importance in tracking the achievement of this objective going forward.
- l. Importantly, this aspect of P.O3 will require on going monitoring and improvement of access to the Porirua Harbour foreshore. Currently, large parts of the foreshore are not accessible due to



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roading, reclamation and the North Island Main Trunk Railway. The plan needs to provide a dedicated target to achieve this objective.

4. Objectives P.O6 & P.O7

- a. Objective P.O6 sets target attribute states (Table 9.2) for water quality, habitats, natural form and character, water quantity and ecological processes of rivers. A similar amendment relating to huanga of mahinga kai and Māori customary use is proposed as for Objective P.O2 above.
- b. Te Rūnanga o Toa Rangatira are supportive of the insertion of clause (e) to target improvements in the existing wastewater and stormwater networks. It provides clarification around achieving the target attribute states and clarifies the requirement for assessment of an activity or discharge in relation to the achievement of target attribute states where policies and rules are not satisfied.
- c. Amendments have also been recommended for Table 9.2 regarding the target attribute states for *E. coli* due to the previous targets now assessed to be unachievable within the specified timeframe.
- d. The amendments mean there will now only be one attribute state improvement by 2040 (ie, from E to D or D to C). For the *E.coli* target, it means that the Target Attribute States have been reduced from B to C at the Taupō Stream (Plimmerton Domain) and the Horokiri Stream and reduced from C to D at Waiohata (Duck Creek) and Porirua Stream (Te Kenepuru) at the Milk Depot.¹
- e. The apparent reductions in the target aspiration is offset by a new Objective P.O7 which states that ‘by 2030 there is no further decline of the health and wellbeing of Te Awarua o Porirua’s rivers.’² While we support this aspiration, there is no supporting information in PC 1 which explains what ‘no further decline’ by 2030 actually means.
- f. We are concerned about the reduction of the *E.coli* Target Attribute States for Taupō Stream, Horokiri Stream, Kenepuru Stream (Porirua Stream) and Waiohata (Duck Creek). These streams are all mahinga kai for Ngāti Toa especially for watercress

¹ The original Porirua Milk Depot was demolished some years ago now and this location identifier will require updating

² As there is no ‘s’ in te reo, Objective P.O7, should state that ‘By 2030, there is no further decline of the health and wellbeing of the rivers of Te Awarua o Porirua.



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and tuna. Taupō Stream is part of a highly significant cultural landscape which includes Taupō wetland, Taupō Pā and papakāinga. It is a renowned site for cultural harvesting. The pollution of this stream has been a concern for the iwi since the 1970s.

5. Policy P.P4

- a. The notified version of Policy P.P4 was to achieve contaminant load reductions by managing land use activities and discharges into Te Awarua o Porirua relation to sediment, zinc and copper into Te Awarua o Porirua relation to sediment, zinc and copper (see below).

Policy P.P4: Contaminant load reductions

To achieve the coastal water objectives in Table 9.1 the Plan will manage land use activities and discharges into freshwater bodies and the coastal marine area to meet the sediment, zinc and copper load reductions for each **harbour arm catchment** as set out in Table 9.3.

Table 9.3: Harbour arm catchment contaminant load reductions

Coastal Water Management Unit (Map 82)	Contaminant	Timeframe	% reduction in baseline total load
Onepoto Arm	Sediment	By 2040	-40%
	Zinc		-40%
	Copper		-40%
Pāuatahanui Inlet	Sediment		-40%
	Zinc		-40%
	Copper		-40%

In addition to the **harbour arm catchment** load reductions, the mean annual sediment load must be reduced in the Takapū part Freshwater Management Unit as set out in Table 9.4 by 2040 to achieve the visual clarity target attribute states in Table 9.2.

- b. It is proposed to remove this policy (and Table 9.3) and replace it with 'Achievement of the visual clarity target attribute state' and a new Table 9.4 which is limited to a measure of visual clarity at the Pāuatahanui Stream. The explanation for the change in the policy states that 'the load reductions required for sediment were not sufficiently certain for inclusion in the plan' and new research finds that load reductions are no longer required to manage ecotoxicological effects and cost considerations.
- c. Sedimentation is one of the most significant environmental issues for Te Awarua o Porirua and has been a focus for researchers going back to the 1970s. If there are no longer targets to reduce contaminant loads in the harbour, then how we will manage land use and discharges to reduce contaminant loads?

Naku noa, nā



TE RŪNANGA O
TOA RANGATIRA

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