

Pāuatahanui Residents Association Submission on Plan Change 1

Supporting Document

The Pāuatahanui Residents Association is an incorporated society representing the rural community of Pāuatahanui from Mt Cecil Road in the east to the Camborne end of Grays Road in the west and to the top of the Paekakariki Hill Road in the north as well as all the side roads off SH58. We have more than 200 households on our email database and reach many more through our Facebook profile, website and through the newsletters delivered by rural mail to each household in the district numbering approximately 400.

Included in our society rules are the objectives of

- Maintain or improve the community and its environment for all residents, while preserving its rural character and scenery
- Promote the advancement of environmental protection or improvement to its rivers and waterways, with particular emphasis on the Pauatahanui Inlet
- Encourage residents to preserve and protect its flora and fauna

We therefore support the intent of Plan Change 1, towards achieving improved water quality and ecological health objectives within Te Awarua-o-Porirua Whaitua.

However, in making our submission we would like to emphasise the following points

- 1) There has been insufficient time or consultation with community for landowners to fully consider the implications of the policies and rules proposed in Plan Change 1 before entering the formal submission process
- 2) The maps provided within the Plan Change document are difficult to decipher meaningfully at a property level making it difficult for landowners to determine how they might be affected
- 3) There has been a heavy reliance on modeling to inform the policies and rules rather than placing the emphasis on collecting reliable data and 'ground truthing' and then applying appropriate actions
- 4) There is inadequate information on clearly committed resourcing from Greater Wellington for implementation of the plan, leaving landowners unsure of what the plan means for them in terms of the costs to them, both financial and time.
- 5) The lack of information on support resourcing, including for monitoring the implementation of Plan Change 1,, means that its implementation is likely to be "patchy" - potentially penalising those engaging proactively and using good management practices while failing to identify or deal with those engaging in poor management practices unless there are very blatant breaches.

- 6) The overall emphasis within Plan Change 1 is on regulatory methods and “requirements” on landowners rather than incentives to engage in best practice. It would achieve better outcomes if it was weighted in accordance with Recommendations 58, 59, 60, 61 and 64 of Te Awarua-o-Porirua Whaitua Implementation Programme, focusing on resourcing positive supports, such as through Greater Wellington’s Environmental Restoration and Catchment teams, and actions rather than on enforcements.

View Submitter Details

Submitter No.	S16
Submitter Name	Pauatahanui Residents Association
Online submitter	Yes
Raw submission lodged	Yes

Raw submission points

These are submission points that were lodged as part of an online submission. They have not been summarised.

Raw sub point number	Provision	Support/oppose	Decision sought	Reasons
S16.1	Method M44: Supporting the health of rural waterbodies.	Support	Retain Method M44	Across our district there are streams leading to the Pāuatahanui Inlet. The majority of the length of these streams run within privately owned rural land. The health of these rural waterbodies is important to our community. To achieve the objectives of the Natural Resources Plan and of Plan Change 1 it is essential that our rural landowners are supported through measures that include, but are not limited to, those outlined in Method 44.
S16.2	9.1 Objectives	Support	Retain the Objectives	We support the objectives that seek to progressively improve the health of Te Awarua-o-Porirua's groundwater, streams, wetlands and coastal marine environment as these are consistent with our Society's objectives.
S16.3	Policy P.P2: Management of activities to achieve target attribute states and coastal water objectives.	Amend	Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by: Reword to read: Target attribute states and coastal water objectives will be achieved by non-regulatory methods, including Freshwater Action Plans, that encourage good management practices. Where measurable improvements in target attribute states are not being achieved, and where actions can have measurable outcomes such as discharges of contaminants, regulatory methods may be required.	We are concerned that regulatory methods can lead to perverse outcomes. For example, if the demands to meet regulations becomes onerous, rural landowners may choose to sell a property by subdividing to smaller block sizes to maximise a return. Subdivision is a city council controlled activity but this is may lead to an intensification in land use.
S16.4	Policy P.P3: Freshwater Action Plans role in the health and wellbeing of waterways.	Amend	Remove reference to "effective regulation" to read Wellington Regional Council shall, in partnership with mana whenua, prepare and deliver Freshwater Action Plans in accordance with Schedule 27 (Freshwater Action Plan). The first iteration of Freshwater Action Plans, to cover all rivers and lakes in Te Awarua-o-Porirua Whaitua, shall be completed by December 2026. Freshwater Action Plans shall identify, in detail, the actions in detail, the actions, including to support effective regulation , to achieve the target attribute states, and support relevant environmental outcomes, set in this Plan.	The wording should be changed to reflect an emphasis on positive actions rather than on regulatory methods. Better outcomes are generally achieved through collaborative and supported means so the the plan should provide for resources from Greater Wellington to be utilised in this way rather than through monitoring and compliance.
S16.5	Rule P.R16: Vegetation clearance on highest erosion risk land-permitted activity.	Amend	A definition of pest plants is required	There are many different pest plants within the region. Some, such as Old Man's Beard, pose a threat to establishing native vegetation while others, such as gorse, are known to act as a nursery for revegetation with native species.
S16.6	Rule P.R27: The use of land for farming activities – discretionary activity.	Oppose	a) and b) do not allow for an individual property scale response	The location of the monitoring site is not defined. It should be possible to demonstrate at a property level whether the concentration exceeds the target attribute state. If the property activities are not contributing to an increase then a change in land use should be permitted.

Raw submission documents

These are files that were uploaded as part of an online submission.

Document name	File	Description	Upload date
Pāuatahanui Residents Association submission to Plan Change 1 - Supporting Document	pauatahanuiresidentsassociationssubmissiontoplanchange1supportingdocument.pdf		14/12/2023 22:34