

25 June 2021

**Te Awarua o Porirua Harbour and Catchments Community Trust
Submission**

To the Greater Wellington Regional Council on the application by Wellington Water and Porirua City Council for a consent to discharge output from an upgrade to the Porirua Waste Water Plant:

The Te Awarua o Porirua Harbour and Catchments Community Trust (aka Porirua Harbour Trust) commends Wellington Water and the Porirua City Council for the very thorough analysis and documentation in support of its request for a 20 year consent with conditions for continued operation of the Waste Water Plant at Ruketane Point.

The Trust acknowledges that granting of the consent will result in all outflows from the treatment plan being fully treated, resulting in minor impact on the biota of the coastal waters into which the discharge takes place. However, the Waste Water Plant is but the end point of an entire waste water collection and conveyance system. The fact is that, even with planned improvements to the capacity of the plant, the pipes delivering wastewater to the plant themselves have limited capacity. This means that in rain events overflows of water will still enter streams and both arms of the inner harbour for many years to come before adequate mitigation is in place. This requires completing a minimum of five large storage tanks and improvements to pipes to prevent leaks into streams and watercourses and eliminating cross connections between sewerage and stormwater pipes.

The Porirua Harbour Trust wishes to emphasise to Commissioners that this application for consent is a small but important part, of ensuring improvement to the receiving waters of the Porirua harbour and its contributing catchments. The Trust requests that in granting this consent the Commissioner(s) encourage the applicant parties to apply the same thoroughness and urgency to all aspects of improvements to the wastewater system.

The Trust fully supports all proposed 36 paragraph conditions contained in Appendix M of the application for consent.

Of critical importance is the review conditions proposed to accompany the consent namely:

Wellington Regional Council may review any or all conditions of the permit by giving notice of its intention to do so pursuant to section 128 of the Resource Management Act 1991, within six months of the fifth, tenth, and fifteenth anniversary of the commencement of the permit, or within six months of the receipt of a monitoring and technology review report completed under Conditions 31 to 34, for any of the following reasons:

- a. To review the adequacy of, and if necessary, amend the monitoring requirements outlined in the permit;
- b. To address any adverse effects on the environment arising from the exercise of the permit;
- c. After a monitoring and technology review report has been submitted to the Wellington Regional Council in accordance with Condition 34, to review the BPO assessment contained in that report and respond to the permit holder's decision to adopt or not adopt the BPO and the permit holder's implementation plan.

Holding the operators to account by way of the review of conditions, including the deletion or amendment of conditions and the addition of new conditions if necessary to avoid, remedy or mitigate any significant adverse effects on the environment, is fundamental to the granting of the consent in our view.

We note that condition paragraph 25 refers to a Community Liaison Group to act as a forum for consultation and liaison with the community and to be used as a vehicle to provide information regarding the Porirua WWTP. Given the Te Awarua o Porirua Harbour and Catchments Community Trust advocacy and guardianship role relating to restoration of the health of the streams and marine waters of the area, the Trust requests that it be added to the named participants of the Community Liaison Group.

Finally, we wish to record our full support for the aspirations of Ngāti Toa Rangatira that the coastal and harbour waters of Porirua should be restored as much as possible to uphold the values of significance to Ngāti Toa including the mauri of the receiving water, access to mahinga kai and kaimoana and Ngāti Toa's ability to exercise rangatiratanga and fulfil kaitiakitanga responsibilities. The Trust looks forward eagerly to further disclosures before or during the hearing on the consent application of how the applicants can contribute further to meeting Ngāti Toa's needs, which very much summarise the long term goals of the communities our Trustees are drawn from.