

## **VANESSA ALISON RODGERS – SUMMARY STATEMENT FOR HEARING STREAM 2**

**11 APRIL 2025**

### **1. Introduction**

**1.1** I have prepared a statement of evidence on behalf of Porirua City Council (**PCC**) dated 14 March 2025 that addresses planning issues associated with Proposed Change 1 to the NRP. My qualifications and experience are set out in my statement of evidence, and I do not repeat those matters here.

**1.2** In this summary statement I address the key issues raised in my evidence. I have also addressed several matters arising from the rebuttal evidence filed by Mary O’Callahan, for Greater Wellington Regional Council (**GW**), and other matters which have been addressed in evidence for other submitters.

### **2. The appropriate framework for target attribute states (TAS)**

**2.1** In principle, I support setting a trajectory of improvement through the use of target attribute states (**TAS**) in relation to the restoration of Te-Awarua-o-Porirua’s freshwater and coastal water bodies. However, the TAS as notified and now recommended through GW’s rebuttal position (**Revised TAS**) are not affordable or achievable in the timeframes set for the Revised TAS (being 2040 for most part Freshwater Management Units (**FMU**)). This is discussed in the evidence presented by Mr Walker and Mr Mendonça, and in the evidence filed by other submitters.

**2.2** The Revised TAS continue to largely adopt the timeframes of the Te Awarua-o-Porirua Whaitua Improvement Plan (**WIP**). The WIP is a non-statutory document, which has not been subject to the same level of evaluation of costs and benefits, or community-wide input through public consultation, that plans under the RMA are required to involve.

**2.3** I also note that the WIP was not adopted by PCC, and so I do not consider it sound to say that PCC was or should have been expected to commence steps to implement the WIP. Regardless, PCC has a strategic priority to commit to the health of Te Awarua-o-Porirua Harbour and its catchment through investment, advocacy and regulation, and has taken

significant actions to improve the quality of the harbour, including through its District Plan, wastewater projects, establishing wetlands and riparian planting schemes. This is covered in Mike Mendonça's evidence.

- 2.4** While I appreciate the level of work that went into producing the WIP (and this work was acknowledged by PCC), it is not clear that the WIP Committee were aware of the significant costs involved in delivering the recommendations set out in the WIP, or whether the community (through the WIP engagement work done) were aware of the significant costs and their implications on rates in particular. I understand that in or about June 2018, a memorandum was presented to the WIP Committee which advised that the projected wastewater improvement costs were 'around \$50 - \$60 per dwelling per year over and above existing wastewater costs (currently \$365 per residential dwelling per year for Porirua City ratepayers)'. Based on the evidence before this Panel, that increase in costs is well less than the current estimates for implementation. I can provide a copy of this memorandum if required, but note that it does not displace the evidence already before the Panel.
- 2.5** Due to the practical affordability issues identified in the economic analysis, including with the 2040 timeline, I consider that the 2060 timeframe warranted careful consideration, and that that this did not occur. In terms of the economic evidence, some analysis of different approaches has been provided through Mr Walker's evidence dated 28 February 2025, including different implementation timeframes. In my view, this information should have been considered as part of the s32 process.
- 2.6** In three of the five FMUs applicable to PCC (Pouewe, Taupo and Takapu), the TAS recommended by the s42A Report are set above the MRI. The rebuttal evidence of Ms O'Callahan has since amended Taupo and Takapu to the MRI (State D). I support this change. However, Pouewe remains at Band C – two bands above the current state of E. I consider the TAS for E.coli at Pouewe should be set at the MRI – that is, Band D.
- 2.7** Table 1 of Dr Greer's rebuttal evidence shows Pouewe to require a 48% load reduction to meet the TAS recommended by Ms O'Callahan in the s42A Report (being Band C). However, Table 11 of Dr Greer's primary evidence states a 48% load reduction is required to achieve Band D. It is not clear to me that the load reduction has been recalculated for Band C for Pouewe. It would be helpful if Dr Greer could recalculate the load reduction required to

achieve Band C at Pouewe. In the absence of such evidence, I expect the recalculated load reduction for Band C would exceed the 50% threshold and be 'difficult to achieve'. In line with the approach taken in Table 12 row 1 of Ms O'Callahan's rebuttal evidence, I consider the E.coli TAS for Pouewe set out in Table 9.2 should be amended from Band C to Band D.

**2.8** As stated in my evidence, I consider achievement of the MRI is appropriate. Therefore, the timeframe is the variable factor. Mr Walker rebuttal evidence has introduced a mixed implementation timeframe. I have some concerns with this approach.

- (a) It is not clear how the dates 2040, 2050 and 2060 have been assigned to each FMU.
- (b) It is not clear if these mixed implementation dates will affect the coastal water objective targets. Dr Wilson stated in his primary evidence that enterococci objectives for Te Awarua-o-Porirua Harbour are likely to be achieved through the actions necessary to meet the E.coli requirements of the NPS-FM (although not the case at Waka Ama site). It is not clear in the evidence provided that the enterococci targets will similarly be achieved if E.coli targets for the Taupo and Te Rio o Porirua and Rangituhi FMU are set to 2060 and 2050, respectively.
- (c) The expected rates increase remains high. Mr Walker estimates that the rates increase for Porirua will be around 11% from now until 2040 and then around 7% from 2040 to 2050. Based on Mr Mendonça's evidence, I consider these estimated rates increases are still likely to be unaffordable.

### **3. Recommended amendments to the TAS**

**3.1** I remain of the view that achieving the MRI across all part-FMU's with a timeframe of 2060 is the most affordable and achievable option for ratepayers of Porirua.

**3.2** Should the Panel recommend pursuing a mixed timeframe approach, I consider the timeframe for achievement of Band D for Taupo FMU in Table 9.2 should be amended **from 2040 to 2060** to be consistent with Mr Walkers recommendations in Figure 1 of his rebuttal evidence. It is unclear to me why this timeframe was not adopted by Ms O'Callahan in her rebuttal evidence, as other recommendations made by Mr Walker were.

**3.3** Appendix 1 to my evidence set out my recommended amendments to various Objectives. This included moving the timeframe to 2060 and setting the TAS for E.coli at the MRI (as set out above) but also other minor wording changes to Objectives P.O3 and P.O6. I continue to support these recommended amendments.

**4. Policy P.P2**

**4.1** With regard to Policy P.P2, I agree this policy is duplicated by other policies. I support the removal of policy P.P2 in its entirety, as recommended by the s42A Report.

**Vanessa Alison Rodgers**

11 April 2025