

**19 Feb 2014**

**Freshwater Consultation Feedback**

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19/02/2014

The following table summarises feedback received from the freshwater consultation process held between November 2013 - January 2014. It includes comments made at public meetings and formal written feedback. The comments are arranged by topic and will be responded to after staff and the FWAG (Fresh Water Advisory Group) has had the opportunity to consider the feedback.

Table: 1

Topic	Comment
<b>Te Arai</b>	<ul style="list-style-type: none"> <li>All the waterways in the Te Arai catchment need protection;</li> </ul>
<b>Waimata/Taruheru</b>	<ul style="list-style-type: none"> <li>The quality of the Waimata and Taruheru Rivers, and all the small town streams, also need to be improved. These waterways and the parks and reserves that adjoin them are very well used by Gisborne residents, as well as wading birds on the mudflats, and other birds and wildlife.</li> <li>The Taruheru River within the city needs to be both dredged and the water quality improved. At present there is unsightly silting between the banks, water depth is limited and overall the area is not attractive. If this stretch of the river were to be improved it would make the city attractive for International Triathlon and other sporting events.</li> <li>Taruheru needs protection – no gated weir, destruction of natural habitat, mudflats is the removal of indigenous species – would create flooding of low lying properties.</li> <li>The proposed gated weir on the Taruheru River – creating flooding of properties the destruction of the natural habitat, the removal of indigenous species that live there.</li> <li>Very concerned about the Tairawhiti Flat water course project – it is being supported by some very influential members of society. The proposal doesn't recognise the hydrological and ecological system of the river, its margin and catchment. This is not something that GDC should be supporting.</li> <li>The proposed new walkways along the inner harbour wall - The future drawing predicts fishing where there is no fishing in ski lane. There is a natural snapper breeding ground on the harbour side and this giving public access to wipe out this. The destruction of the mussels at the end of the wall. There should be no fishing or food gathering in these areas and should just be a walkway.</li> <li>Not sure about the grazing along the Taruheru as noted in the discussion document; seems to be out of step with the aim of improving quality which is important for a waterway that is so much a visual component of the city and contributor to the water quality of the Bay. Dealing with these sub catchments suggests the next target may perhaps be the Waimata and working towards the objective of improving the Bay and showing an integrated approach to water quality</li> <li>Taruheru needs water quality improvement - this obviously aligns our proposal for the weir development to take place in the aim of developing a central flat water asset for active recreation and sports training/events. If water quality was at a premium (i.e. within healthy ranges) and development was to go ahead I honestly believe this asset has serious potential from a sport and recreation perspective to help Gisborne develop a 'national' point of difference and showcase between 4-6 regional / national level events annually. Not only will this help drive economic development but also be a great community asset for the regions families to gather and play.</li> <li>Concerned about the non-recognition of issues relating to saline/estuarine waters especially those of the Taruheru;</li> </ul>
<b>Motu</b>	<ul style="list-style-type: none"> <li>Motu River has a water conservation order below the waterfall and this must be maintained. We would like to see other natural waterways protected in a similar way e.g. Opato/Waioeka catchment.</li> <li>The Motu river catchment. This is a prime natural asset for our community and others. I understand that it's partially protected by a water conservation order and the elements of this need to apply to the entire river. No further intensification of agriculture should be allowed in this catchment without very robust mitigation measures being put in place to ensure that our community does not have to pay socially and environmentally for someone else's economic gain.</li> </ul>
<b>Wharekopae</b>	<ul style="list-style-type: none"> <li>The Wharekopae Stream is also a special ecosystem having an almost entirely natural catchment, and deserves some special recognition because of this.</li> <li>Rere Rockslide needs improvement – swam there 40 years ago and since being made a public tourist attraction has degraded water quality – rubbish left scattered in immediate areas.</li> </ul>
<b>Waikanae</b>	<ul style="list-style-type: none"> <li>I would like to see the Waikanae creek by the skate park and information site continue to be beautified and planted. It is another very central and visible piece of water to both locals and tourists. The river walkway looks beautiful at high tide but can often look ugly and be smelly at low tide.</li> <li>The new walkway running along Alfred Cox Park will draw more attention to the Waikanae. The stream would benefit from closer attention to tidying up the errors of the past and improving appearance and quality.</li> <li>The emphasis seems to be on the larger catchment areas apart from Waikanae Stream</li> </ul>
<b>Wainui Stream, Hamanatua Stream</b>	<ul style="list-style-type: none"> <li>We would like to see work start in 2014 on the catchment of the Wainui &amp; Hamanatua streams.</li> <li>The Wainui &amp; Hamanatua streams water quality needs improving - Both streams have low water quality.</li> <li>Wainui stream has high faecal counts from stock and sewage overflows from the city catchment area.</li> <li>Also high silt content from earthworks in subdivision development in the city catchment area. (Ellmers development in Wainui Rd.)</li> <li>Hamanatua stream has high faecal count from stock and silt from erosion upstream. Sandy Bull informed us of the erosion at a meeting at the Wainui surf club for the Wainui Beach management strategy.</li> </ul>

Topic	Comment
	<ul style="list-style-type: none"> <li>We would like to see work on these two streams commence in 2014, even if on a minor scale to start.</li> <li>Both discharge onto the pristine wainui beach so water quality needs to be improved for swimming, surfing, fishing and diving.</li> </ul>
<b>Protected waterways</b>	<ul style="list-style-type: none"> <li>Quite a heavy focus on Gisborne waterways which is understandable but would appreciate just as much focus on East Coast with our industries and reliance on water for basic needs also;</li> <li>Where waterways have retained reasonable levels of natural character (e.g. streams in pastoral landscapes with riffle, run and pool settings, and some shade and bank integrity) water quality here may be relatively easily maintained or improved. They may, however, also be susceptible to rapid degradation from, e.g. upper catchment forest clearance, intensification of agricultural activity, and stream bed and bank disturbance. These are probably our most 'at risk' waterways of dramatic and cascading change.</li> <li>Water quality should be protected in all waterways, as should key values associated with waterways. The protection of water quality is not inconsistent with social and economic development, but it is a precondition for sustainable development.</li> <li>Human values associated with good quality water, such as for potable purposes, fishing and food gathering and contact recreation, provide weight to the need for protecting and restoring water quality.</li> <li>Freshwater systems cannot be traded off, one locality against another. This is because each locality is dependent on these systems, whether it be a lake, river or wetland, both for the wider functioning of the landscape and ecology, and also the human communities present;</li> </ul>
<b>Improved waterways</b>	<ul style="list-style-type: none"> <li>It should be established that each waterway and catchment area must maintain or improve water quality measures in its own right. There must be no trade-off where water quality in a catchment is permitted to degrade on account of an improvement elsewhere in the district;</li> <li>Generally, there are two classes of waterways where water quality is poor or degraded and needs to be a focus for improvement. These are:</li> <li>Waterways in relatively intensively managed agricultural settings, including mixed cropping and pastoral rotation systems. Frequently, these have been modified (channelized) to accommodate field maximisation or land drainage systems and may be continually being disturbed. They are also usually subject to higher inputs of nutrients and pesticides, including herbicides to control eutrophic aquatic plant growth, and sediment from bank collapse and stock disturbance during the pastoral component of a rotation. Water extraction from such streams and associated aquifer systems may also be implicated in a decline in water quality in such settings. Examples in the current Waipaoa and Turanganui catchment focus include the Taruheru River (e.g. at Tuckers Rd site) and the Whakahu (at Brunton Rd). Waterways in urban settings. Examples include the lower reaches of the Taruheru, Waimata, Turanganui and Waikanae Rivers. In places these have been extensively modified through, e.g. channelization, the creation of stream bank structures, and the introduction of <i>Spartina</i> grass. These lower reaches receive inputs from the agricultural landscapes in their lowland and upper catchments, as well as stormwater discharges containing a range of harmful contaminants. They are also subject to episodic discharges of human sewage during periods of intense or protracted rainfall. Nevertheless, despite problems associated with poor water quality, these river reaches are sites of high social, cultural, economic (visitor industry) and amenity values, and are regularly utilised for contact and secondary contact recreation, fishing and kaimoana gathering.</li> <li>One difficulty that exists with the directive to improve the quality of degraded water bodies, however, is an understanding of the return to be expected from restoration initiatives. That is, where might significant improvement be made? Landowner and land manager commitment to such a process is necessary.</li> </ul>
<b>Collaboration, community</b>	<ul style="list-style-type: none"> <li>There are knowledgeable people in our community that Council could work with to improve water quality. There is a problem and action needs to start now to rectify it.</li> <li>Need policy and partnering opportunities that empower landowners and occupiers to better protect waterways;</li> <li>GDC does their bit (and leads by example) + community doing their bit = better quality waterways.</li> <li>Listen to and act on suggestions from independent conservation groups</li> <li>Rongowhakaata acknowledges and thanks all those people and entities they represent in the deliberations they have undertaken over the past 3 years on these important issues.</li> <li>Establish local "waterway rangers" to be guardians of the waterways they live or work near. This will add a real hands on protective measure for the waterway and more personal involvement for GDC at a local community level.</li> </ul> <p><b>Stakeholder Workshops</b></p> <ul style="list-style-type: none"> <li>The Tairāwhiti Freshwater Support Group has made a submission that proposes a way to get stakeholder buy-in on those key issues of water allocation and use. Simply put, it proposes to get the key water use stakeholders together to negotiate and come to agreement on the use of water. By getting this agreement before water policy is set, you achieve buy-in by those who use the water. This makes the setting of policy much easier.</li> </ul>
<b>Vision/Issues/Outcome Statements</b>	<p><b>Our Issues</b></p> <ul style="list-style-type: none"> <li>Thinking about "Our Issues" on Page 8, I generally appreciate the words and want to comment on two of the bullet points. <ul style="list-style-type: none"> <li>Firstly, erodible hill country contributing to sedimentation as a reality means that close attention to land management and avoidance of exacerbating erosion and sedimentation is required by all land managers all the time as they plan and manage their operations. I think this is an</li> </ul> </li> </ul>

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	<p>area where, taking into account the good remedial work that has been done, still more is required to correct the situation if we are to protect water quality and quantity for the future.</p> <ul style="list-style-type: none"> <li>o Secondly the comment about gaps in technical understanding suggests a fund to complete strategic studies into water issues may be a matter to discuss. An example is the Managed Aquifer Recharge Project which hopefully will get underway with a Government grant. The work is crucial to long-term better understanding of aquifer recharge mechanisms. Reliability of funding for strategic water projects to increase understanding will become more significant as water supply quantity, quality and allocation issues become more problematic.</li> </ul> <p>Outcome 1</p> <ul style="list-style-type: none"> <li>• I felt, as I read outcome statement 1, the thinking within the purpose statements had already been overlooked and perhaps overtaken by a shorter term use philosophy. Outcome 1 for example, launches into beneficial consumptive use with seemingly only token connection to 'instream uses and values'. I don't feel that ecology or the wider Regional Council role the Unitary Council has in relation to water is caught in these 12 statements as written. The regional role includes soil conservation, water quality and quantity, (freshwater and seawater), air, water and land pollution, and biodiversity conservation.</li> </ul> <p>Outcome 4</p> <ul style="list-style-type: none"> <li>• hesitation about Outcome 4. Continuing to let a water body deteriorate as a consequence of human neglect or abuse seems an irresponsible and poor water management action when our draft plan highlights the long-term situation we face. I suggest we know enough about water issues to do better than drafted Outcome 4 suggests. Landowners have a higher duty, I think, when it comes to water.</li> <li>• Agree that water quality should be maintained, and where necessary improved, in fresh water bodies. However caution is needed using the term 'protected', as this term is not defined in the discussion document, nor is it defined in the RMA. Furthermore, there is a large difference between the terms 'improved' and 'protected'. Also this implies that water quality is to be maintained or improved only in freshwater bodies where there are freshwater values to be protected; not in freshwater bodies that are deemed not to have values that do not require protection.</li> </ul> <p>Outcome 9</p> <ul style="list-style-type: none"> <li>• The complexities around the fresh water cycle and the impacts of land use have, in some regions, been poorly transferred into regulation. It is paramount that the Gisborne District Council understands the factors affecting the regions freshwater resources and develops a statutory plan accordingly.</li> </ul> <p>Outcome 10</p> <ul style="list-style-type: none"> <li>• Support the identification of water bodies in the district that are deemed to be outstanding and while a definition of 'outstanding' is provided in the discussion document we would recommend that the definition would need to extend to a schedule of such water bodies. However, as mentioned above, the term 'protected' is not defined in the discussion document. The Resource Management Act 1991 (RMA) does use the term "protection" but in relation to lakes and rivers and their margins and the prevention of inappropriate subdivision, use and development of these resources, and not of outright protection of the water quality as outcome 10 alludes to.</li> <li>• The National Policy Statement for Freshwater Management 2011 (NPSFM) does state in Objective A2 that "the overall quality of fresh water within a region is maintained or improved while: (a) protecting the quality of outstanding freshwater bodies" and one would assume that Outcome Statement 10 has been derived from this objective. However, there is a distinct difference in interpretation. Objective A2 in the NPSFM aims to protect the quality of the freshwater body, whereas Outcome Statement 10 sets out to protect the water quality within an identified outstanding water body.</li> </ul>
<b>Discussion document</b>	<ul style="list-style-type: none"> <li>• The document strikes the right kind of balance between economic, social and cultural perspectives;</li> <li>• We applaud GDC on the Freshwater Plan and the way this has been developed. The tramping club use many of the water catchments in the Gisborne District and nearby districts for walking, swimming, and drinking and greatly value the remaining natural areas in our district.</li> <li>• The document is well presented – yet apart from the comments by Dame Anne Salmond and Murray Palmer – appears primarily to satisfy current and future human fresh water needs.</li> </ul>
<b>Values</b>	<ul style="list-style-type: none"> <li>• Great care will need to be taken to ensure that water quality and ecological and cultural values are not sacrificed in expedient trade-offs;</li> <li>• Can we have more information about the difference between a waterway's roles in food production as distinct from irrigation for agriculture please? It is conceivable that if the two are distinct, and food production is essentially a community value, then protection of a water body for the use of future generations (for food production) might be appropriate in low flow periods there is a clash of values; care must be taken to consider economic consequences that may be placed on sectors of the community. Therefore, continual consultation is vital.</li> <li>• Let's restore the true value, which includes the life giving/spiritual value of our rivers, into the mindset of the community, so that there is enough of the quality and quantity of freshwater to cater to everyone's needs.</li> <li>• We need greater discussion on freshwater issues facing the district. There has to be a different way of valuing our fresh water not just in economic terms.</li> <li>• Being ecologically sustainable means imposing limits to water use and sticking to them. It also means imposing limits on sources of degradation e.g. intensive agriculture or mining. It's about working smarter, looking at alternatives to these economic developments so our region grows in harmony within the limits of our ecosystems.</li> </ul>

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<b>Oil and Gas</b>	<ul style="list-style-type: none"> <li>The document quotes a Tag Oil geologist (p29) as though the object of the oil industry was to achieve "an improved understanding of aquifers, waterways and water quality". However, the document makes no mention of the enormous water demands that would be made by the oil industry of fracking were to be implemented in the region nor of the vast quantities of polluted wastewater it would produce.</li> <li>Grave concerns about the potential impact of oil and gas exploration and extraction on water availability and quality in the Gisborne District. Particularly distressing to me is the possibility that the GDC could give oil companies consent to use hydraulic fracturing (commonly known as fracking). There is growing worldwide concern about the impacts of fracking on the environment in general and on water resources in particular.</li> <li>I ask that the GDC give extra scrutiny to the issues around oil and gas water usage and waste disposal. Our district has a thriving agricultural and tourism economy. Is it worth sacrificing these to satisfy the water and waste needs of oil and gas that only want to come in here and take the oil and gas resources for their profit.</li> </ul>
<b>Dairy</b>	<ul style="list-style-type: none"> <li>Limits need to be set on intensive dairy farming. Population limits may need to be considered to protect prime agricultural land from being developed for residential and industrial use.</li> </ul>
<b>Forestry</b>	<ul style="list-style-type: none"> <li>Concerned about the impact of forestry on water quality. Issues include depletion of topsoil, forest clearance, acidification of water and a lot of new waste washing up on beaches;</li> <li>Contractors and owners need to be held accountable for leaving slash in waterways;</li> <li>I think the work of Dr Mike Marden of Landcare on setback is relevant and could be given greater attention to ease the issues that may be attributed to forest harvest. I like the thought of moving away from tree crops with low value on the world commodity market, to higher value tree crops aiding landowner returns while reducing harvest damage to the land and reducing sedimentation in the long-term.</li> </ul>
<b>Riparian Management</b>	<ul style="list-style-type: none"> <li>In those areas where reticulated stock water is not possible or practical, and natural surface water is the sole source of water for grazing animals, provision for access to water must be allowed;</li> <li>It is considered appropriate to give some direction at this stage for future management in the Water Plan. We are considering a targeted policy requiring stock to be excluded from waterbodies, or parts of waterbodies, that are identified as protected and where stock access is incompatible with other values. This could be achieved through either regulatory, non-regulatory or a combined method. In areas like Ngatapa with inconsistent rain falls creeks flows vary wildly;</li> <li>Small creeks can even be dry for up to 2 years, and then in contrast flood in the event of a weather bomb. Owing to the steepness and terrain surrounding these creeks it is impractical to even consider fencing them off. The cost would be beyond most farms and they would never stand the test of time and fail in the first major storm;</li> <li>Next are the larger creeks which too have very random flows. These are relied on for stock water where often there is no practical alternative. Fencing would be very difficult and likewise expensive. Multiple floodgates would be required where fence lines intersect. These too would be subject to failure during storm events;</li> <li>Where stock has been excluded for long periods such as cropping paddocks there is a very rapid rise in creek bed caused by silt accumulating in the long grass. This in turn leads to overflowing in time even onto roads and more, and causes stop bank failure;</li> <li>There are some sites where it is practical to fence off "debris traps" which will filter creek water and be semi beneficial. These do have limits during flooding and the intersecting fences often buried or washed out;</li> <li>Over all the massive cost of fencing and limitations of other water sources inhibit the choices for hill country farmers on this water issue;</li> <li>I submit that Council's water plan be practical and realistic and accepting of the limitations of mitigation in most of the livestock farming hill country;</li> <li>It needs to be made clearer that stock exclusion and riparian restoration is standard best practice in the protection and restoration of freshwater systems and in particular sensitive habitat.</li> </ul>
<b>Ecology, habitat, biodiversity</b>	<ul style="list-style-type: none"> <li>Waterways provide habitat for a myriad of native species. They are not simply there for humans to abstract from and treat as drains - Minimum levels need to set high to protect ecology of the area;</li> <li>The plan should ensure the removal of barriers to fish passage up and down the waterways - such as at culverts and impassable weirs.</li> <li>Minimum Flow Limits are very important to the health of waterways. When flows are low, the health of a stream or river is impacted and life in those waterways is put under strain. Our district has a great tradition of sport fishing in both the sea and our local rivers and streams. This makes our waterways important to our local tourism industry. If minimum flow limits are set too low in order to facilitate the taking of water by commercial concerns (such as dairy, agriculture, horticulture, oil exploration and extraction, farming and others), then the waterways will have less running water in wet seasons and perhaps run dry in the summer months.</li> <li>I refer to the NIWA document, <i>Instream habitat and flow regime requirements for the Waipaoa and Te Arai Rivers</i>. There are three options suggested for minimum flows. The first option is the one currently used by GDC on consents. The minimum limits in this option are below the MfE suggested limits in the other two options. Option two is the default minimum flow suggested in the <i>Proposed National Environmental Standard on Ecological Flows and Water Levels</i>. Option three is a higher minimum flow that would support ecological values at a higher level than Options one or two.</li> </ul>

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	<ul style="list-style-type: none"> <li>I realise that there must be tradeoffs in order to support the ecological values of our waterways while being able to use their waters for commercial concerns. I ask that those tradeoffs not always go to the benefit of commercial concerns at the expense of our environment and tourism industry. It is always easier to maintain ecological values than it is to restore them after they have been degraded.</li> </ul>
<b>Recreation</b>	<ul style="list-style-type: none"> <li>The Waioeka Scenic Reserve (and adjacent Urutawa Conservation Area) is outstanding in that it is so accessible being adjacent to SH2 and with numerous short and easy, or longer and more challenging walks, it is seen by so many people, very many of them visitors to Gisborne, and the windy road forces people to drive more slowly and so appreciate the scenery. Many people just stop at a rest area, walk down to the river and picnic or swim, but many spend more time enjoying the natural water and native bush. This river system really is a treasure which should be specifically recognised with a protection order.</li> <li>The Wharekopae River is promoted as an attraction for Gisborne residents and visitors, and it is very disappointing to arrive at the rock slide and see the danger signs (which unfortunately need to be clearly visible). There has also been a suggestion of a walking track between the waterfall and rock slide through stream edge vegetation, largely in reserve land. Firstly the reserve needs to be fenced to exclude stock, then the stream edges need fencing where farmland abuts the stream, and native plants and trees should be planted along the stream starting from the top of the waterfall near the bridge. This would reduce the stock faecal coliforms in the water and enhance the attractiveness of the stream.</li> <li>People need to become accountable and aware of the damage when our rivers flood bringing logs and waste into our rivers. This is particularly noticeable for our river users i.e., kayakers, rowers, waka ama. Our local beaches then also reflect this debris as we walk, run or play on local beaches.</li> <li>Resort towns that do well economically invest heavily in their waterways/ rivers....people are naturally drawn to water, Gisborne could do so much better by cleaning up our waterways and focusing around the recreational part of it, we don't have to keep the river in its natural muddy state either. I have seen the same tyres, road comes and steel in the rivers around the bridges for the last 9 years, I have never seen any person from G.D.C actively cleaning any part of our rivers. Great to see some interest in it but let's get on with it already, what do you need from us rate payers to support this?</li> </ul>
<b>Setting limits</b>	<ul style="list-style-type: none"> <li>We need to propagate an understanding of the importance of high flows for maintenance of dynamic river morphology and flushing sediments. Thus, great care needs to be taken when allocating high flow as well as low flow allocation.</li> <li>In terms of the future direction of the Freshwater Plan, support an output based - policy approach that accurately accords with national directions to first set water body values and associated limits. All future catchment specific limits must be underpinned with robust scientific justification.</li> </ul>
<b>Efficient allocation and use</b>	<ul style="list-style-type: none"> <li>The discussion document has identified that historically water permits can only be granted for 5 year periods. Expiry of a permit needs to be significantly extended to provide greater certainty for water users, to recognise the considerable investment associated with development and to encourage future development.</li> <li>Council have identified a number of ways in which water may be managed during times of water shortage and are considering a number of different methods including via pro rata and/or on a priority basis. It should be recognised that in certain situations priority needs to be afforded to essential needs during times of water shortage conditions. Those matters which are afforded priority require careful consideration and we would welcome the opportunity to be part of these discussions.</li> <li>Council have indicated the importance of being able to transfer water permits. This should be encouraged within the provisions of the FWP. The ability to transfer water permits enables the water resource to continue to be used efficiently and effectively.</li> <li>Implementing a 'use it or lose it' regime would probably result in unnecessary abstraction in order to justify continued access.</li> </ul>
<b>Overall quantity</b>	<ul style="list-style-type: none"> <li>Note the prediction that domestic water demand will remain constant but commercial and industrial use is forecast to increase significantly. Then I note the prediction that available water supply in 2063 will not be able to meet demand in some areas. This increase in commercial and industrial demand is a key issue for city residents but not an explanation as to why the issue should be contained to city residents. Surely it is a matter for commerce and industry as well. I'll agree residents benefit from commerce and industry for employment and maintaining lifestyles in some cases, but not to the point where residents will bear the costs of water or reliability of supply to maintain commerce and industry. There are water quantity and quality issues for commerce and industry (and this includes the pastoral farming industry) to work on alongside residents.</li> <li>I note the comment growers locked into a supply market have indicated they would relocate if reliability reduced through imposition of minimum water levels in the Te Arai and Waipaoa. My perspective is that long-term ecology and the long-term environment of the District is a higher priority than a supply market problem. I suspect that if we are having problems of quantity and quality that growers will find it a less than simple matter to relocate. Far better to concentrate on efficient use and a coordinated response if supply issues do arise in the future. These are political decisions the community needs to engage in. My view is that the environmental factors protected by a well advised and considered low flow regime should not be compromised for commerce.</li> </ul>
<b>Setting limits</b>	<ul style="list-style-type: none"> <li>There should be adequate protection of minimum flow rates and allowance for flushing and flood flows to maintain the health of the waterways.</li> <li>Any future catchment, sub-catchment and property specific limit must be appropriate and respond to the context within which they are to be applied.</li> <li>The application of such limits should only be applied following a detailed analysis of nutrient demands at both a catchment level and individual property level. Property specific assessment of nutrient losses can be effectively modelled by the use of decision-making tools such as OVERSEER and indeed this approach is being adopted by other regions, often in conjunction with the use of farm environment management plans ( ' FEMP' s' ) which assess, amongst other things, an individual property's nutrient inputs and outputs on a case-by-case basis. We note that the Canterbury Regional</li> </ul>

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	<p>Council has recently issued decisions that set a framework that FEMP' s are to follow within Canterbury, with the critical management components of FEMP's being risk assessment, setting of objectives and timelines and review and independent verification (auditing) provisions. Such an approach accords well with the Land and Water Forums recommended approach of achieving effective nutrient management control through the implementation of Good Management Practice (GMP) and Audited Self Management (ASM) as a requirement of the District Plan.</p>
<b>Wetlands</b>	<ul style="list-style-type: none"> <li>• That 90% of wetlands and lakes are reported as historically drained during conversion to pasture may assist in explaining in part why we are facing quality issues today. The attention noted for remaining wetlands in the discussion document is supported. Greater attention to wetlands would, I think, give many intangible benefits in addition to easing run-off issues in some locations.</li> </ul>
<b>Managing discharges</b>	<ul style="list-style-type: none"> <li>• Need to think about the storm water drains/creeks in urban areas, they need care and looking after,</li> <li>• The freshwater plan needs to encourage riparian planting to reduce the effects of runoff. There also needs to be promotion (and if needed subsidisation) of the fencing of waterways to exclude stock.</li> <li>• Field drainage systems should be viewed as point source discharges</li> </ul> <p>Re discharges from hydrocarbon exploration and mining: <i>This [Discretionary activity status] gives Council full discretion to assess exploration proposals and apply best practice responses (p20).</i></p> <ul style="list-style-type: none"> <li>• Discretionary activity status for such discharges also provides full opportunity for GDC to grant or refuse consent. Needs to be reworded.</li> <li>• Priority should be to control faecal coliform contamination in all waterways around the district;</li> <li>• I like this section and the work plans that are indicated in it. I support those intentions and, accepting funds are always an issue, commend the actions proposed as important. I especially agree with the assertion that poor land management practices around waterways can create water quality issues through sedimentation and faecal contamination. These matters carry an ongoing imperative for action by primary industry land managers. I remain uneasy at the comments on potential increase in farming intensity. Until existing levels of intensity are managed to avoid water contamination, there can be little scope to agree to an increase of intensity without very determined attention to the detail necessary to ensure water quality is not compromised.</li> <li>• I support the comment in relation to high faecal contamination levels. There is a case for testing to determine sources and to show where improvement has occurred. There is a need for a range of voluntary and regulatory approaches. The issue does need to be dealt with and cannot be shelved.</li> <li>• The need for care in relation to forestry harvesting and re-establishment is gently made yet the issue is a serious matter given the rolling nature of forest harvest across the district.</li> </ul>
<b>Overall Quality</b>	<ul style="list-style-type: none"> <li>• In general it would be great to improve water quality for all main beaches.</li> <li>• 3 main rivers in Gisborne, plenty of recreation takes place around these waterways and we should have even more of our people enjoying it, on average Gisborne has a negative view on the cleanliness of our rivers, do a survey on Gisbornes perception of our water ways</li> <li>• It should be our goal to have safe and clean waterways;</li> <li>• There are three main pollutants of fresh water in New Zealand, sediment, pathogens and nutrients (p?). While usually correct in most rural settings, there are other major contaminants of water, including those derived from urban stormwater, and sewage and industrial discharges. These also affect water quality in our region.</li> <li>• The streams draining the Poverty Bay flats, especially Te Arai, which has a huge decrease in quality after leaving the Waterworks Bush catchment, need to be managed to reduce nutrient rich run off by stopping stock access, fencing off margins and planting vegetation.</li> <li>• We applaud the aim of maintaining or improving the overall quality of fresh water across the region (but not of allowing one stream or catchment to be degraded while another is enhanced to offset this).</li> <li>• We would not support land use changes that would allow further degradation of water quality and are concerned about intensification of land use e.g. conversion to dairying in the Matawai - Motu area and on the East Coast because these are likely to impact on water quality of waterways including Motu River.</li> <li>• Stock numbers need to be limited to what the natural systems can actually sustain, and nutrients applied also need to be limited. Perhaps farm developments in sensitive areas should be required to be organically certified to ensure that new developments will be sustainably managed and have a minimal impact on waterways.</li> <li>• Freshwater quality should be one of our highest concerns. We need to act now to improve these waterways for future generations.</li> <li>• Restoration of native freshwater life of all types must be a priority as the waterways are severely degraded;</li> <li>• Freshwater reserves should be established to assist revitalisation of the resources similar to the marine reserves;</li> <li>• Any freshwater developments must not degrade the natural environment;</li> <li>• I am troubled by a passage on page 23 where there is a suggestion we may manage to degraded values. Heard also a suggestion at the public meeting in the GDC chambers that a farmer group was reported as considering that managing to a lesser level may mean "development "could continue. I reject any suggestion that managing any water body to a lesser level is acceptable. I simply do not feel we can afford to allow such a plan.</li> </ul>

Topic	Comment
	<ul style="list-style-type: none"> <li>• I believe we should be always looking at water quality problems and dealing with them towards improvement. A long-term approach to improving and maintaining water quality is essential I think</li> </ul> <p><b>Quality</b></p> <ul style="list-style-type: none"> <li>• I have a view the potential allocation issues for the future are an incentive for action to commence now on dealing with to quality issues further up the catchments that to date have not been closely attended to. I think all the water needs to be accorded greater value and cared for accordingly against the day we need those waters to be in usable condition. I do not think we can be complacent about the quality of any waterway. As a city dweller in the lower part of the catchment, I do not accept it is reasonable that a person or commercial business higher in the catchment can let water run from a property in a manner that carries contaminants from that higher altitude property. The contaminants arising from any business or industry in the catchment not connected to a formal waste water management facility, or covered by a specific discharge agreement with GDC, should be captured and managed at that point as part of the business operating cost. Spreading private or business costs to others further down is not acceptable. We have evolved a pastoral farming system that has not needed to, or been required to take great care with run-off or regard to those downstream. As we face increasing pressure for quality and quantity of water, the approach of the past may no longer be acceptable; I believe there is an increasing imperative for better attention to managing run off at all levels in the catchment.</li> <li>• I have a concern in relation to the tests showing low water quality at Rere Falls and the comment in the discussion document attributing that to ruminant animals. We know the Wharekopae runs to the Waipaoa and that aquifer recharge is associated with the rivers. We are in the process of learning more about aquifer recharge mechanisms. It may be that the potential for aquifer contamination from run-off gives additional incentive to improve attention to managing farm run-off given the substantial value attached to aquifer quality.</li> <li>• I note the perspective from Darryl Monteith. "Fresh water is a key asset for tourism, fishing, swimming, as well as for drinking...without quality fresh water many of our visitors would not come to the region and there would be less opportunity to grow the visitor economy based on the quality of our fresh water environments .....". The discussion documents cover image of Rere Falls - does not show the water in this backcountry location is not safe for bathing. Dave Hughes is saddened by the changes in fauna and biodiversity in his lifetime. Dave is talking of loss of these values and this is a key issue for a Unitary Authority. Peter Andrews comments that "freshwater is the lifeblood of farming, it helps to drive business – livestock needs water that's of good quality from a reliable source..." Good comment from Hamish Cave on the high value placed by pastoral farmers on fresh water noting that "without it we would be out of business. The better the water quality the better the stock performance". These comments add to the case that quality is important across the spectrum of users and waterways.</li> <li>• I note the NIWA report dated December 2012 on the GDC website records that our Unitary Authority is the only regional authority that does not use biological testing. The report notes that biological testing, in association with water quality testing, provides information for the Council's State of the Environment report. I note the discussion paper reference to ruminants being a cause of faecal coliforms in water at Rere Falls and Wainui. In these cases, and at other locations, biological testing alongside water quality testing would assist to determine where problems were coming from. I suggest better attention to water testing including biological monitoring would assist meet regional obligations and guide long-term efforts to improve water quality. I see biological monitoring as a matter for ongoing fund allocation by the Unitary Authority with an initial strategic and additional effort to pin down problem locations. I fully support and endorse the intention in the discussion paper towards more regular biological monitoring.</li> <li>• Establishing regulation, in particular for non-point source discharges, is the common mechanism by which regional councils are attempting to manage nutrient levels in fresh water. This has recently occurred in Manawatu-Wanganui, Canterbury, Lake Taupo and soon to be occurring in Hawkes Bay. It should be noted that in all of these regions the councils determined that the region's freshwater bodies were over-allocated in terms of nutrients; either nitrogen or phosphorus. The Gisborne District Council has stated throughout this discussion document that the water quality indicators around nutrients are currently good and that the river water quality is good. Ravensdown agrees with and supports these statements. It follows that the same level of management tools established by other regional councils to address nutrient over-allocation are not required in the Gisborne region. Also supported is the assertion that better understanding the contribution of the primary industries is important to future management. Ravensdown is willing to assist council in their research of nutrient inputs and losses from primary activities.</li> </ul> <p><b>Dry-stock farming, Intensive farming, Horticulture, Dairying</b></p> <ul style="list-style-type: none"> <li>• Council recognises that the nutrient inputs of dry-stock farming are low and that there is no intention to regulate. Ravensdown agrees with this. However, the assertion that an appropriate management tool for intensification of dry-stock farming is a trigger level for fertiliser inputs and nutrient loss rates is inappropriate and seems like a knee-jerk reaction to the regulatory approach of other regional councils. Of the four land use activities listed on page 19 (dry-stock farming, intensive farming, horticulture and dairying) dry-stock farming has the lowest inputs and the lowest nutrient losses of them all, so it is alarming to see that a strict regulatory approach is mooted if a sheep and beef farmer for example intensifies.</li> <li>• Ravensdown feels strongly that regulation based on farm practice does not become a prescriptive, constraining, input-based regulation. Regulation based on inputs to farming systems may lead to a loss of farmer flexibility to manage economic and environmental outcomes on their property. Support should be given, if necessary, to regulatory processes that encourage flexibility and innovation that existing and new (future) good management practices (GMPs) can provide, based on managing farm system losses and 'output' based management of the risk of adverse effects.</li> <li>• Ravensdown agrees that nutrient levels in lowland waterways and aquifers is an issue in which vigilance is required. This may be an area where further research is required. The discussion document states that audited environmental standards are commonplace in the horticultural sector and are required for market access. This is also increasingly the case for other sectors such as dairy and sheep and beef. Ravensdown is interested in the statement that the audited standards will be recognised in the Freshwater Plan.</li> </ul>



Topic	Comment
	<ul style="list-style-type: none"> <li>Council should be reminded that the RMA is an effects-based statute and that it enables activities, so long as any environmental effects are managed to levels considered acceptable by the community. Also as mentioned previously council will need to be careful not to discourage intensification as this can provide economic investment, growth and development to the Gisborne district. This can be balanced with the encouragement of production gains from lowering environmental footprints. 7</li> </ul>
<b>Stormwater discharge</b>	<ul style="list-style-type: none"> <li>The release of storm water into our rivers needs to become a thing of the past. Also storm water/ sewage overflows causing discharges into the river/stream systems and the marine environment need a shorter time frame for fixing than the present plan to upgrade infrastructure.</li> </ul>
<b>Catchment approach</b>	<ul style="list-style-type: none"> <li>While the overall objectives of the Freshwater Plan may be outlined at a regional level, the critical decision making can be expected to occur at the catchment or 'water zone' level. Hence, two interrelated factors are of critical importance. My input to this discussion feedback process is that these are:</li> <li>Recognition of the distinctiveness of each catchment/zone in terms of the geophysical characteristics of the area and the community values present. Knowledge of these cannot be determined solely at a desktop level, but only through hands on field work and input from local people.</li> <li>This process of catchment/zone planning needs to be developed through collaboration between <ul style="list-style-type: none"> <li>Those who require the planning is completed (central govt, GDC, communities, industry);</li> <li>And those who have intimate knowledge of the local landscape and who will be most affected by decisions relating to it (community).</li> </ul> </li> </ul> <p>Catchment/water zone planning thus will be characterised by the following roles:</p> <ul style="list-style-type: none"> <li>Govt/GDC: <ul style="list-style-type: none"> <li>Outline of the statutory framework for decision making (RMA; NPSFWM; regional plans);</li> <li>A framework for robust local participation and decision making including collaboration and independent facilitation;</li> <li>Resourcing for local participation and decision making.</li> </ul> </li> <li>Local community <ul style="list-style-type: none"> <li>Venues for discussion (e.g. marae; community halls);</li> <li>Liaison people (catchment secretariat) and collaborative facilitation;</li> <li>Notification to the community via social networks of discussions and decision making forums.</li> </ul> </li> </ul> <p><b>Dealing with the Waipaoa Catchment</b></p> <p>I support the plan to work through the issues starting with the Waipaoa Catchment. I have a doubt about RIVAS producing a gospel truth but this could be reduced if it was taken only as a base and that improvement remains an objective. I note Stan Pardoe's comment about the Te Arai, " We want the Te Arai to flow, we want it to be in better shape than what it is...." There is a lot of work inherent in this aspect of the plan and good opportunity to positively involve parts of the wider community for long-term gain. Opportunities to increase understanding and develop techniques that will assist water quality and quantity across the district may arise as more is learnt about the catchment</p>
<b>Maori cultural values</b>	<ul style="list-style-type: none"> <li>Water is important to the cultural vitalisation of whanau, iwi, hapu;</li> <li>Ensure access to pristine waterways for continued customary practices</li> </ul> <p>Rongowhakaata</p> <ul style="list-style-type: none"> <li>Wai and Whenua are the most significant taonga of Rongowhakaata.</li> <li>At all our functions we acknowledge the significance of our mountains, rivers, hapu ancestors and our Iwi.</li> <li>A full understanding of what is happening in our waterways, the effects, and then the remedies to enhance water quality, values better usage are outcomes we are seeking as they will benefit our whole region.</li> <li>Customary fishing on the Waipaoa and Te Arai is still practiced by our people in Manutuke. Kanae (mullet) eels, flounders, whitebait are some of the species we serve when we host people at functions. Access to the river is an outcome we continue to seek from this process with GDC.</li> <li>Te Arai in particular has sustained the Ohako, Ruapani and Tawhiri people for generations. Until the 1960s families took water from the river for their everyday use.</li> <li>We are concerned at the number of water permits and volumes of water take allocated from Te Arai.</li> <li>The outcome from the deliberations on future access and allocation will have a huge impact on our people.</li> <li>We have significant land buildings north of the Te Arai River; to date we have no access to water.</li> <li>The potential of this highly productive land is restricted and was a factor in our Treaty settlement to be addressed.</li> </ul> <p>Recreational use:</p> <ul style="list-style-type: none"> <li>The decline in wetland areas is a concern. We note that a significant area of wetland that is still in our ownership, this will continue and we are planning to grow and enhance what we currently have. We respectfully ask that the land fill at the Airport be discontinued, GDC have the ability to action this, please walk the talk,</li> <li>With good stewardship and common sense from this project we should collectively generate robust plans that will mitigate our leaching and run offs from our farm land. This is an outcome will impact on our future as people of this region.</li> <li>For iwi awa are a taonga and the preservation of the mauri and wairua of a water body is integral in enabling the expression of kaitiakitanga</li> </ul>

Topic	Comment
	<p>obligations. It is essential that the serious water quality and quantity problems are addressed and resolved in a comprehensive and collaborative manner;</p> <p>Te Runanganui o Turanganui a Kiwa Proposed Waipaoa Catchment Management Plan</p> <ul style="list-style-type: none"> <li>• The following programmes are fundamental to the proposed Waipaoa Management Plan <ul style="list-style-type: none"> <li>○ Environmental inventory including but not limited to GIS mapping of: <ul style="list-style-type: none"> <li>▪ Waahi tapu</li> <li>▪ Historic landmarks</li> <li>▪ Mahinga kai</li> <li>▪ Traditional and current food gathering areas</li> <li>▪ Taonga aquatic species</li> </ul> </li> <li>○ Freshwater sentinel biomonitoring programme <ul style="list-style-type: none"> <li>▪ Develop a more accurate and reliable programme that monitors the health and mauri of freshwater bodies by using appropriate aquatic flora and fauna;</li> </ul> </li> </ul> </li> <li>• To develop the Waipaoa Catchment Plan we suggest that the FWAG focuses on reaching a consensus on a broad framework of values, outcome targets, limits and mitigation strategies for the whole catchment. It would be specific enough to provide baselines for the GDC to assess new resource consent applications in the Waipaoa Catchment immediately while being able to be refined and implemented at a more detailed level over time;</li> </ul>
<b>General Questions</b>	
<ul style="list-style-type: none"> <li>• Has anything been discussed or plans projected regarding the Te Karaka sewage ponds outfall being pumped to trickle through a block of pines?</li> <li>• Does the H.C. Williams plan of piping water from the Motu River the Poverty Bay stack up if the irrigators were paying not the City ratepayers?</li> <li>• Well points and deep well bores need minimum height upstands to help minimise incursion of back flow in times of flooding – especially anywhere near spray sheds. This may be in place now, is it?</li> <li>• Water quality testing to a very high standard at the "Bushmere Augmentation Plant" to identify any chemical residues and run off from farming, horticulture and forestry, upstream of the plant.</li> <li>• The same as above should also apply to all our recreational rivers and streams. Some of the modern chemicals being developed for the land based production operations have not been around long enough to take in the side effects and the minute traces hazards.</li> <li>• The recreational plans for the Taruheru, Waimata and Turanganui are expensive pipe dreams in my view. One algal bloom in those sort of confines could be disastrous and lethal to both man and beast. We have a monument already, in the form of "Watties" fisheries wharf; the result of a retaining wall gate that did not work and what is being planned in the Taruheru is on a lot grander scale than that; so the \$\$\$\$ are not on for this Region.</li> <li>• The preservation and enhancement of our recreational waterways spread throughout the hinterland of this region needs to be given some serious consideration and thought; not just those waterways that are used strictly for profit. It is not for this forum but it would encouraging for us users, for GDC to take a serious and a legal interest into the access and use of our fresh water assets in this region.</li> </ul> <p>Some research needs to be done as regards the enhancement and implementation of recharge to some of the aquifers on the flats. Over the years with "Council" I have observed various land drainage out lets <b>"TAKING"</b> drainage water back into the ground, the same applies with some open drains; e.g. 150mm of water flowing under Lavenham Road nothing flowing through the stop bank a few hundred meters away</p> <ul style="list-style-type: none"> <li>• Does the Council have a council nursery for production of native plant species?</li> <li>• where are the maraes presence and contribution in the community;</li> <li>• where is the incentive for domestic landowners;</li> <li>• There should be bylaws for people fringing waterways ensuring they do their bit to preserve;</li> <li>• Waterways needing improving include: Taruheru, Waipaoa and Waimata;</li> <li>• Urban sprawl and land inhabitation of areas required for replanting and regeneration;</li> <li>• These rivers provide the indigenous and general populous to a recreational and cultural right;</li> </ul>	