RMA Form 13
Submission on application concerning resource consent

Sections 41D, 95A, 95B, 95C, 96, 127(3), 136(4), 137(5)(c), and 234(4), Resource Management Act 1991

Application number DW-2020-109732-00 / WD-2020-109733-00

To: *Gisborne District Council*

Name of submitter: *Hannah Kohn*

This is a submission on an application for bundled resource consent to discharge to water and discharge wastewater to land lodged by Gisborne District Council - Community Lifelines.

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the application that my submission relates to are—

Entire application including term of consent.

My submission is—

Our waterways are already under threat from multiples sources. We should not be choosing to go along the pathway of discharging untreated wastewater into these systems under any circumstances. Such discharge has a risk of short and long term adverse effects which can be avoided if action is taken at present.

I oppose the application for resource consent by Gisborne District Council to discharge untreated wastewater into various locations for a period of 20 years. Authorisation of the discharge for a prolonged period is not environmentally or culturally responsible nor sustainable and will have adverse effects on the environment and on communities.

Section 3.5 of the AEE sets out the Alternative Management and Reduction Options.
For Wet Weather Overflows, the options considered include:

1. Increasing wastewater pipe capacity
2. Increase storage in the wastewater network
3. Greater public contribution to private drainage

These are not dynamic options/alternatives. They are 'more of the same' and will not result/promote in resilient and sustainable infrastructure. Options should include incentivising the following alternatives by providing education and discounting associated technology:

- Incentivising rainwater roof collecting to reduce the discharges of stormwater into the system
- Incentivising domestic and commercial compostable toilets to reduce the discharges of sewage into the system
- Designating land for wetland restoration and Stormwater swales instead of hard infrastructure.

I seek the following decision from the consent authority:

A consent term of two years be granted while better alternatives can be instated.

I do not wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

I do not request pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

HK
Signature of submitter

.
Date 16/09/20

Telephone: 0274540155

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15/09/2020 AT
1111HRS

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: McClutchie, Josie
Surname: First Name(s)

Address:

6 (No.) Turenne St (Street/Road) Kaiti (Suburb)

Gisborne (Town/City) 4010 (Postcode)

Mobile: 02102463334 Other phone:

Email: josiemak@gmail.com

2. Submission on

Application No: DW-2020-109732-00 / WD-2020-109733-00

Name of applicant: GDC - COMMUNITY LIFELINES

Type of resource consent applied for: GISBORNE WASTEWATER NETWORK – OVERFLOW DISCHARGES

Brief description of proposed activity: **BUNDLED** Wet and dry weather overflows from Gisborne Wastewater System

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

See supporting document attached

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

See document attached

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Received date: ☐ Support ☐ Oppose ☐ W.T.B H ☐ N.B.H

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I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

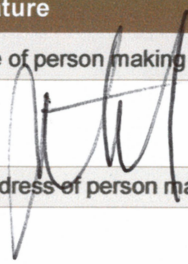
See document attached

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [ ] Would you consider presenting a joint case with others who have made a similar submission? [x] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter



Date: 15.09.20

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

Contact person:

Mobile: Other phone:

Email:

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Gisborne Wastewater Network – Overflow Discharges - Gisborne Reticulated Services Area
Resource Consent Applications DW-2020-109732-00 / WD-2020-109733-00
(Gisborne District Council Community Lifelines)
September 15, 2020

Josie McClutchie, Gisborne resident and ratepayer opposes the consent application in part.

This is a submission to the proposed and following resource consent:

Discharge from the Waste Water network into Taruheru, Turanganui and Waimata Rivers.

The specific parts of the review and any new conditions proposed that my submission relates to are: The allowable and if granted the number of permissible discharges of untreated water into the three Rivers.

I oppose the consent application in part.

Reasons for submission are:

a) My home is directly impacted by wastewater overflows during significant rain events. Since returning home to work in 2012 my household has been subjected to an unacceptable level of stress and disruption caused by Gisborne's city's wastewater network. Nearly every winter for the past seven years not long after I bought my home, I've had to endure sewage overflows either directly onto my property or indirectly to the street and surrounding neighbourhood. These are not the living conditions I expected to return home to after living away for over 20 years. The romanticised views I held of coming home to raise my child and set up business here 'in paradise' have been soured by the constant worry that now consumes me. My small whanau dreads the rain whenever it falls in Gisborne. We live in fear of every downpour wondering when the next one is going to disrupt our home life. Since moving into my home there have been countless times when Gisborne's wastewater network has been inundated causing sewage overflows to my property or at my neighbours.
b) As recently as July this year, I've had sewage from Gisborne's main sewer network overwhelm the laterals at my property during two separate rain events. When this happens, my toilet back-flushes to nearly overflowing, my kitchen and bathroom sinks won't drain and sewage from the main network flows up my gully trap. Once, after another distress call to Council for help, I was given the option to give authorities the go-ahead to 'release the valve' at the end of my street to discharge the overflow into the river. Releasing a main network valve will alleviate the sewage build-up on my property much more quickly. I declined the offer and self-evacuated instead. To be the reason for another discharge into the river was too much of a burden and to me felt criminal.
c) Apart from being a disruption to my home-life my ability to work is disrupted too because I work from home. When a wet-weather event overwhelms my drains I am forced to stop work, self-evacuate and seek refuge with family and or friends – just so I can use the toilet, take a shower, prepare a meal .
d) In spite of the Council's attempts to address the issue on my street with measurements such as the installation of a non-return valve in front of my home; the installation of a storm water drains to neighbouring houses to reduce the inflow of water into the main network; and free gully trap repairs to several hundreds of homeowners - the problem has not been fixed. Not to sound ungrateful because I do appreciate that Council has made a large investment into trying to fix the issue. But, the problem still exists and along with it the continued stress.
e) The last seven years have been emotionally draining. The time spent raising the issue with Council and advocating on behalf of my street for a long-term fix has been exhausting.
f) Keen to be part of the solution, in 2019 I collaborated with the Council's Drainwise team on developing a community WWM education campaign. While I don't believe that the community is the primary cause for water entering and overwhelming the wastewater

network I do agree that the community has an obligation to take better care of their drains. The DW campaign was received well but this year's wastewater discharges seem to suggest that the messaging did not get through. Blockages from private laterals were the blame for the most recent discharges and yet that was one of the key messages behind the campaign – for Gisborne residents to stop putting the wrong things down their drains. Maybe another approach is required and maybe the message should be delivered by another entity such as an Iwi group or recreational water group such as waka ama, kayaking or surfing?

g) Due to my involvement in the DW campaign I am now very reluctant to allow my child to swim in any of the rivers or participate in any river based water sport. One of the local waka ama clubs that features in the DW campaign was very keen to support the messaging because their club members for years have been impacted by the wastewater discharges into the river. A founding member of the club gave numerous accounts of paddlers being hospitalised or becoming seriously ill after contracting infections by what they believe was due to contaminated river water. Their experience over the years has indicated that the contaminants are primarily caused by sewage discharges and for many years they have opposed Council's legal right to discharge wastewater into the river. I'm a long-time paddler and my daughter wants to be one too. But that won't be happening because of the potential risks to her health. It's unaccetable that the health of our rivers and the community particularly the recreational water users are also put at risk. And yet Gisborne prides itself on its beautiful rivers and beaches.

h) If the GDC gains resource consent to legitimise the discharges into the rivers does this mean that the real underlying issue, the one of Gisborne's ageing and failing wastewater network will not be addressed?

i) Since forming an advocacy group with my neighbours I have learnt from senior residents that the issue of wastewater overflows onto their properties and in the Kaiti area has been happening since the 70s. For years they've tried to get Council to address their WW issues but were ignored. Frustrated, some homeowners resorted to building 'out-houses' in their backyards, purpose built to cope with rain events that caused their inside toilets to overflow. When I approached my neighbours to advocate on their behalf many were unconvinced I would get any results from Council because they'd tried and tried in the past. Given the history of Council's lack of attention and action in the Kaiti area, a predominantly Māori area, Council's attitude towards the Kaiti area can only be described as discriminatory because for decades it has neglected the Kaiti area's wastewater network problems. Until more recently when the sewage discharges started being reported on the national news and all over social media.

j) With climate change on the rise, extreme rain events are becoming more regular. This year alone has already seen GDC allow three discharges into the rivers. That to me is not a long-term sustainable solution for any city. Nor does it bode well for a healthy, flourishing community if the wastewater network is not able to cope at full capacity. Without the basic infrastructure our local economy and community cannot maintain good standards of wellbeing-while keeping up with current population growth, let alone the potential growth in a post-covid world.

Relief sought:

1. Further funding is made available by GDC to more rapidly implement the current Drainwise program.
2. A fresh review of the Drainwise Program is undertaken by a body independent of GDC.
3. Establishment of a community group to represent the concerns of residents so that they have a voice and can give feedback and ideas to GDC's WWM plans

I wish to be heard on my submission. I wish to present a joint case with another submission that is similar.

Josie McClutchie
6 Turenne St
Kaiti
Gisborne
p: 02102463334
e: josiemak@gmail.com

MINISTRY OF EDUCATION
TE TĀHUHU O TE MĀTAURANGA

RECEIVED
07/09/2020
AT 1259HRS

07 September 2020

Gisborne District Council
39 Gladstone Road
Gisborne

Gisborne District Council: Gisborne Wastewater Network – Overflow Discharges Resource Consent Application

Attn: Todd Whittaker (Independent Processing Planner)

The Ministry of Education is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Background:

The Ministry is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on educational facilities and assets in the Gisborne district.

The Ministry's submission on the application by Gisborne District Council (GDC) is as follows:

The Wastewater Overflow Discharge Consent is for the discharge of untreated wastewater from the Gisborne wastewater network that occurs within the Gisborne reticulated services area in situations where the wastewater network has been inundated with rainwater in heavy rain and also in cases where there is a malfunction or blockage in the network.

The Ministry notes that the Overflow Discharge Consent includes discharges to land and water (rivers) and to the Coastal Marine Area (CMA), although direct discharges to the CMA are not anticipated.

The Overflow Discharges Consent seeks to authorise overflows subject to a range of actions and measures that seek to progressively reduce overflow frequency, volume, and risk to manage risk where overflows occur.

The application states that overflows are managed through two primary overflow points (utilised when necessary); two secondary points, utilised only in large events (between the 5% and 10% AEP events – two year and 10 year ARI) as circumstances require; and up to six tertiary overflow points, which may be required to be opened in very large rainfall events (larger than the 10% AEP/10 year ARI).

The application seeks a 20-year term and there is potential that this could affect schools close to discharges and may therefore effect the health of students over this period. There are seven schools within 300m of a primary, secondary or tertiary overflow point that have the potential to be adversely affected by a wastewater discharge overflow. These are listed below.

Primary Overflow Point (Seymour Road/Turenne Street)

- Ilminster Intermediate
- Te Wharau School

Secondary Overflow Point (Palmerston Road/Peel Street) and Tertiary Overflow Point (Fitzherbert Street)

- Gisborne Community Early Education Centre Te Whare Tiaki Tama

Tertiary Overflow Point (Lytton Street)

- Riverdale School
- Lytton High School
- Te Whare Whai Hua Teenage Parent Centre

Tertiary Overflow Point (Childers Street)

- Whare Amai Early Learning Centre

While the Ministry acknowledges that the frequency of overflow events is anticipated to average 2.5 per year with a maximum of four per year and that the total wastewater volumes have reduced over time with a current average of 7,000m^3 wastewater discharged in an overflow event. However, the Ministry wishes to emphasise the importance of avoiding any adverse effects on the health of students who attend schools in the vicinity of the discharge. This is particularly important for students who travel to school on foot or by bicycle who are at an increased risk of exposure, should an overflow occur during the school week.

The Ministry seek the following from the consent authority:

There are seven schools which could be adversely affected by overflow events within the Gisborne district. While the Ministry recognises that the general aim of the Overflow Discharge Consent is to progressively reduce overflow frequency, volume, to manage risk where overflows occur, the Ministry would also like to know:

1. What is GDC doing to avoid and mitigate any adverse effects on schools and surroundings?

2. What is being done to reduce the potential and frequency of overflow over time as frequency has the potential to increase as a consequence of climate change?

The Ministry seeks ongoing communication with GDC in relation to the above questions and would like to be consulted on any strategies and plans for locations near the schools listed above.

Further, the Ministry requests that they and the schools are notified immediately of any overflow events that occur at the overflow points that are located near the schools listed above.

Overall, the Ministry supports the resource consent as it seeks to put actions and measures in place to progressively reduce and manage the risk of overflow events in the Gisborne district. The Ministry seeks ongoing communication with the GDC on overflow events and consultation on strategies and plans that may be put into place near effected schools.

The Ministry wishes to be heard in support of its submission. If others make a similar submission, the Ministry would consider presenting a joint case with them at the hearing.

Should you have any more queries please do not hesitate to contact the undersigned on behalf of the Ministry.

Danielle Rogers
Planner- Beca Ltd
(Consultant to the Ministry of Education)

P: +64 7 838 0510

E: danielle.rogers@beca.com

Wed 16/09/2020 12:51 PM

Todd Whittaker <todd@planningworks.co.nz>

Re: Waste water discharge resource consents

To Owen Lloyd

Cc Caroline Wilkinson; Katerina Maka

You replied to this message on 16/09/2020 1:06 PM.

Tena koe Owen,

Thank you for your email. We will include this as a formal submission to the GDC wastewater application and you will receive a formal acknowledgment as well. If you have any questions about the process and hearing please let me know.

Caroline/Katerina, can you please record Owen's email as a submission.

Nga mihi
Todd

Todd Whittaker (MNZPI)
PLANNER – DIRECTOR
M: 021 676 377

E: todd@planningworks.co.nz
10 Roger Guy Place - RD 5 - Tauranga - 3175
www.planningworks.co.nz

From: Owen Lloyd <Owen.Lloyd@tdh.org.nz>
Date: Wednesday, 16 September 2020 at 11:24 AM
To: Todd Whittaker <todd@planningworks.co.nz>
Subject: Waste water discharge resource consents

Tena koe Todd
Nga mihi kia koe me te wiki o te reo Maori
On behalf of the Iwi o Nga Ariki Kaiputahi, mana whenua o Mangatu I wish to register our
View of the GDC applying for a exemption to allow over flow of waste into the Gisborne rivers and sea.
We say NO!
Owen Lloyd
Kaitiaki
Nga Ariki Kaiputahi Iwi

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22/09/2020 AT
2307HRS

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: Gibson (Surname:) Charlotte (First Name(s))

Address:

No. | C/O Te Poho o Rawiri Marae (Street/Road) | Kaiti (Suburb)

Gisborne (Town/City) | Postcode

Mobile: | Other phone:

Email: umuariki@gmail.com

2. Submission on

Application No: Resource Consent Applications DW-2020-109732-00/WD-2020-109733-00

Name of applicant: Gisborne District Council

Type of resource consent applied for: Discharge

Brief description of proposed activity:

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

See attached submission

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

1. We oppose the application.2. We seek a consent duration of 5 years as opposed to 20 years.3. The aim of consent should be to eliminate wastewa

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Received date: ☐ Support ☐ Oppose ☐ W.T.B H ☐ N.B.H

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I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

See attached submission

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [ ] Would you consider presenting a joint case with others who have made a similar submission? [x] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter

Date: 23/09/2020

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

Contact person: Charlotte Gibson

Mobile: Other phone:

Email: umuariki@gmail.com

PO Box 747, Gisborne 4040 • 06 8672049 • 0800 653 800 • notifiedrc@gdc.govt.nz • www.gdc.govt.nz • GisborneDC

22 September 2020

Gisborne Wastewater Network – Overflow Discharges – Gisborne Reticulated Services Area
Resource Consent Applications DW-2020-109732-00/WD-2020-109733-00
Gisborne District Council

Thank you for giving us this opportunity to make a submission on the above consent applications. Ngati Oneone have participated proactively in the KIWA group dialogue but reserve the right to make a submission.

Ngati Oneone oppose the consent application. The reasons for this opposition are detailed as follows:

1. **Length of consent**
   a) A 20-year consent is sought. This is contrary to Policy C6.2.2.9 in the Tairawhiti Resource Management Plan ("The Plan"). This policy was put in The Plan as a result of the decisions made by the Commissioners at the *Proposed* Freshwater Plan Hearings. This was due to submissions made by iwi about how unacceptable the discharges were culturally and the long history of lack of action on the wastewater discharges from the Council.

   b) A 20-year consent is a concern given the long history of inaction on an issue which was identified as a specific concern by iwi in the 1990s when the Regional Policy Statement was notified. If the Council has another 20-year consent (effectively a continuation of their previous Permitted Activity) there is a high risk that a change in priorities from the Council will mean that insufficient action is taken to eliminate the discharges. At this point in time we have no confidence that with a 20 year consent the Council will proactively work at speed to eliminate the overflows.

   c) Policy C6.2.2.9 identifies that overflows need to reduce before a longer consent could be considered. We are concerned that neither the application nor AEE indicate the timeframe that Policy C6.2.2.9 requirements will be met.

   d) A 5-year consent as opposed to a 20-year consent, will encourage the Council to ensure that maximum effort is taken to reduce overflows, as is intended by the Policy.

2. **Eliminate vs reduce**
   a) The basis of the application seems to be to reduce, not eliminate wastewater overflows. It doesn't seem to be aspiring to meet the criteria for a consent of longer than 5 years as outlined in Policy C6.2.2.9 in The Plan.

   b) The application seems to base this on the assumption that the costs to eliminate the overflows will be too high. We think that the overflows are completely unacceptable and that the goal of the programme cannot be reduction it must be elimination.

c) The application talks about a "prudent approach" – we are not looking for a prudent engineering solution, but something which eliminates a culturally offensive activity.

3. Dry weather overflows

a) The scope of the application and what is sought to be included in the consent is too wide. The application does not adequately address the effects of dry weather overflows. They affect the urban waterways at a time when they are being used mostly for recreation and kai gathering.

b) Dry weather overflows that reach a waterbody or are discharged directly to a waterbody should not be covered by a consent. They should be prohibited by consent conditions – with enforcement action because of such overflows.

c) The environmental and cultural impacts of dry weather overflows are very significant as the wastewater stays around much longer. They can have long term ecosystem health and recreational impacts.

d) For example, the application does not mention any process improvements made since the Wainui Stream overflow in 2015 from the Steele Road pump station. The impact of this overflow impacted the stream for sometime. Eels died and adjacent landowners were finding tampons and condoms on the streambank and at Wainui beach for weeks afterwards.

e) The water quality monitoring, and the information included in the AEE seem to all be focused on wet weather overflows. Dry Weather overflows are a Non-Complying Activity because their immediate environmental effects can be damaging. The application talks about dilution available in large waterways, but like the Wainui Stream event, dry weather overflows can occur in the many small waterways in Turanga. If this occurs in summer, then there may be minimal water available to dilute such events.

f) There is insufficient information within the application to justify granting a non-complying consent to discharge wastewater during dry weather.

4. Public vs private good. Short term vs long term approaches.

a) A major premise of the management of the wastewater overflow system is that it is preferable to discharge wastewater to the rivers rather than onto private property. This is understandable; however, the solutions being used, seem to be standard engineering approaches.

b) The options you have looked at and dismissed (including storage) seem to have been dismissed as "too hard" without any clear analysis. Are the easiest options being taken rather than the most effective? Short term easy vs long term gain is a concern.

5. Council's strategic direction vs RMA requirements

a) The application places a lot of emphasis on the Council's strategic direction. Statements such as "given the other infrastructure challenges Council faces, emergency storage at pump stations will not be prioritised in the ten years of the Long-Term Plan", are unacceptable in an RMA sense.

b) The Councils position of not wanting to spend more money is the same argument used to not put in place a wastewater treatment plant until forced to by the Environment Court. The LTP is irrelevant in an RMA context. We seek that Section 6 (e) of the RMA be implemented –

> *"In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:*
> *(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga"*

c) The waters into which this wastewater is discharged are our taonga – Waimata and Turanganui.

d) Wastewater overflows impact the ability of hapu to continue their relationship with their taonga – by disrupting activities like waka ama, kai gathering and by depleting the mauri of waterbodies.

5. Significance of the Waterbodies

a) The application seems to downplay the significance of the major Turanga waterbodies: The Taruheru River is identified in The Plan as a Significant Aquatic Ecosystem Waterbody. There are major recreational sites on all three rivers (Taruheru, Waimata and Turanganui) – arguably they are the most heavily utilized recreational waters in the whole of Tairawhiti, and they have cultural value to Ngati Oneone.

b) The application also fails to identify the impacts on smaller waterbodies such as the Wainui and Kopuawhakapata Stream – which are at risk from impacts of dry weather overflows and are secondary or tertiary sites for wet weather overflows in some circumstances. The relative impact on these waterbodies, which do not have the mixing benefit of seawater provided in the estuarine Taruheru/ Waimata/ Turanganui system will be much greater and this is not considered in the application.

6. Water Quality

a) We note that the Council AEE has compared the water quality to freshwater values in the ANZECC guidelines. Given that Turanganui, Taruheru and Waimata are estuarine systems and are tidal for their entire reaches within Gisborne City, this comparison is confusing.

b) Consideration needs to be given to how water quality indicators compare to estuarine health indicators. How do they compare to the standards set in the Waipaoa Catchment Plan? How do they relate to the national bottom lines set for water quality in the NPSFM?

c) It is clear the water quality is poor but the clear direction in both the NPSFM and The Plan is that where water quality is degraded point source discharges should not further degrade the water quality.

d) Policy C6.2.2.7 states:

"When waterbodies are identified in a catchment as degraded due to:

- *Bacterial contaminants, wastewater discharges will be required to improve the quality of the discharge and/or reduce the volume of the discharge in order to meet the relevant freshwater objective as quickly as practicable; and*
- *Stormwater contaminants, stormwater discharges will be required to improve the quality of the discharge and/or reduce the volume of the discharge in order to meet the relevant freshwater objective as quickly as practicable.*

7. KIWA Recommendations

a) The KIWA group has recommended the following:

- Tangata Whenua need to be engaged on an ongoing basis moving forward, in a meaningful, authentic, and practical manner; this engagement reflects the tangata whenua position at a point in time, and systems need to be put in place to ensure changes over time are addressed.
- All possible avenues must be explored to bring forward the DrainWise Implementation Programme, including seeking alternate sources of funding and approaching the Trust Tairāwhiti (formerly the Eastland Community Trust), and involving tangata whenua in those discussions.
- Tangata whenua should be provided with opportunities to work alongside Council to resolve these issues.
- Monitoring related to wastewater overflows should be reviewed to include cultural elements, and make the monitoring relevant to kaihoe waka, shellfish gathering, and other Māori resource-use practices.
- Current public health monitoring procedures and locations should be reviewed to make sure they adequately capture health risks.
- Management protocols related to dry and wet weather overflows should be reviewed by the KIWA Group, integrating tikanga aspects such as the placement of rahui and other processes. Tangata whenua need to be kept informed on the DrainWise Implementation Programme and be given opportunities to input.
- Projects to improve mauri should be identified, rectified (implemented) and then ongoing protection provided.

b) The KIWA report summarises many aspects of our position well – for example:

- *"Tangata Whenua support the reductions, but the aim must be to eliminate wastewater overflows.*
- *Reductions in wastewater overflows would result in a shorter duration of negative effects, but the 'chronic' issue of tapu would remain.*
- *Tangata Whenua expressed frustration at the lack of progress by Council in reducing wastewater overflows. While the DrainWise Implementation Programme has been set up to achieve the TRMP reductions, Tangata Whenua want improvements to occur as fast as possible. Their view is that not enough has been done in the past regarding wastewater overflows."*

c) We also consider that the "non wastewater" aspects set out below need to also be considered as part of this resource consent application:

i) Engagement approaches with tangata whenua need to be agreed for future engagement processes. These must take into account tikanga and kawa.
ii) Processes need to involve iwi as a partner in decision-making as provided in the Treaty of Waitangi.
iii) Iwi should be able to practically participate in management of the awa and moana.
iv) Tangata whenua must be actively engaged on all matters related to wastewater and water in general, through a meaningful partnership approach - mātauranga Māori must likewise partner western science.

d) It is not clear how any of the consultation, or the KIWA recommendations have actually influenced in any way the work that that the Council proposes. It appears that consultation has been undertaken, recommendations made and all of this has been ignored as the application is based on the current LTP and Wastewater overflow reduction plan developed in 2016.
e) The inclusion of a reference group does not address the fundamental issue about what and how decisions are made on the programme.

8. Proposed Consent Conditions

We propose the following consent conditions:

a) Scope - we oppose the granting of any consent that allows more than a minor (e.g. 100 litre maximum) amount of wastewater to be discharged to a waterbody.

b) Expiry – we seek that a maximum of 5 years be granted and oppose a 20-year consent.

c) Draft Condition 3 - we oppose the way this condition is worded. If future LTPs reduce the funding for wastewater overflow reduction it could be argued this is consistent with this condition. Funding should be increased, and this work should be prioritised. No condition should allow the Council to get out of performing its functions.

d) Monitoring - any monitoring plan should be agreed to and signed by Ngati Oneone (and other iwi) as meeting our requirements. Council signoff is insufficient.

e) Condition 12 – this should be achieved within 10 years of lodging the consent application, not after the resolution of any appeal – i.e. by 2030, otherwise it just creates an incentive for the Council to drag out the resource consent process as long as possible.

f) Tangata whenua reference group – this has insufficient delegation. It should not be advisory, but decision making.

We wish to be heard in support of our submission.

Nga Manakitanga

Charlotte Gibson

Ngati Oneone

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

RECEIVED
15/09/2020 AT
0830HRS

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: ORCHARD (Surname:) SUZANNE HELEN (First Name(s))

Address:

9 (No.) MARIAN DRIVE (Street/Road) INNER KAITI (Suburb)

GISBORNE (Town/City) 4010 (Postcode)

Mobile: 0221517648 Other phone: (06) 9278070

Email: suzanneorchard@gmail.com

2. Submission on

Application No: 109732/109733

Name of applicant: SUZANNE ORCHARD

Type of resource consent applied for: Gis. Waste Water Network - overflow discharge

Brief description of proposed activity: SUBMISSION AGAINST PROPOSAL BY COUNCIL

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

All of it.

It will have dire consequences on the environment for 20 years if the Council is granted permission to discharge raw sewage with wastewater into this or any other streams.

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

One of the reasons I bought my house was that a lovely stream formed one of my boundaries. There are wetas in its banks + eels + kōkopu can be there. At times eels can be seen in it. I have been told that the waste water infrastructure needs upgrading and is unable to cope with "fat burgers" caused by householders + food outlets pouring fat down their drains. If this is so there should be a push to educate people as to how best to dispose of their fat. To dispose of raw sewage into this + other streams should not even be a consideration especially into a stream adjacent to a primary school (Graham Rd) Upgrading the waste water system in Tairawhiti should be a top priority in Tairawhiti.

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Received date: ☐ Support ☐ Oppose ☐ W.T.B H ☐ N.B.H

I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

I wish for the Council not to apply for resource consent to discharge raw sewage + wastewater into this or any other streams for the next 20 years.

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [x] Would you consider presenting a joint case with others who have made a similar submission? [x] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter

S. H. Orchard

Date: 14 Sept 2020

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

Contact person:

Mobile: Other phone:

Email:

PO Box 747, Gisborne 4040 • 06 8672049 • 0800 653 800 • notifiedrc@gdc.govt.nz • www.gdc.govt.nz • GisborneDC

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Consent Management Act 1991.

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

Reference Number:	RCS200917218
Submitted On:	13/09/2020 04:55 p.m.

Person making submission:

Surname	Rangiuia
First Name(s)	Megan
Address	70 DeLatour Road, Kaiti, Gisborne 4010
Mobile	0275456447
Other phone	068676233
Email	principal@ilminster.school.nz

Submission on:

Application No	DW-2020-109732-109733-00
Name of Applicant	Gisborne District Council
Type of resource consent applied for	Discharge to water/Discharge wastewater to land
Brief description of proposed activity	Discharge of untreated wastewater from the Gisborne wastewater network within the Gisborne reticulated services area when the network is inundated with rainwater in heavy rain-or when there is a malfunction or blockage in the network. This includes discharges to land and rivers
Position on application	I oppose the application
Clearly state which parts of the application you support or oppose or wish to have amended:	Extremely concerned at the proposal for the discharge of wastewater to the river bordering our school boundary. How many properties are we dealing with in terms of discharge? Are the people who own these properties not responsible for their own wastewater?
The reason for making my submissions are (briefly describe the reasons for your views):	Our students use ngahere (as we call it) for all sorts of curricular and extracurricular activities. We are concerned about untreated bacteria, contaminants, toxins and pollution so close to our school which could impact our ability to interact with the environment, this is a space that our students have cleaned, looked after, and replanted the surrounds of over the years.
I wish the Gisborne District Council to make the following decision (give details, including nature of any conditions sought):	GDC - please find another solution to discharge this wastewater so that it goes into the councils' system rather than into an open space so close to our children.
I wish to speak at the hearing in support of my submission	No
Would you consider presenting a joint case with others who have made a similar submission?	Yes

Confirmation

Are you submitting this form on behalf of another person?	No
I confirm that all the above details are correct.	Yes

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RMA Form 13

Submission on application concerning resource consent

Sections 41D, 95A, 95B, 95C, 96, 127(3), 136(4), 137(5)(c), and 234(4), Resource Management Act 1991

Application number DW-2020-109732-00 / WD-2020-109733-00

To: *Gisborne District Council*

Name of submitter: *Melita Raravula*

This is a submission on an application for bundled resource consent to discharge to water and discharge wastewater to land lodged by Gisborne District Council - Community Lifelines.

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

The specific parts of the application that my submission relates to are—

Entire application including term of consent.

My submission is—

Our waterways are already under threat from multiples sources. We should not be choosing to go along the pathway of discharging untreated wastewater into these systems under any circumstances. Such discharge has a risk of short and long term adverse effects which can be avoided if action is taken at present.

I oppose the application for resource consent by Gisborne District Council to discharge untreated wastewater into various locations for a period of 20 years. Authorisation of the discharge for a prolonged period is not environmentally or culturally responsible nor sustainable and will have adverse effects on the environment and on communities.

Section 3.5 of the AEE sets out the Alternative Management and Reduction Options.
For Wet Weather Overflows, the options considered include:

1. Increasing wastewater pipe capacity
2. Increase storage in the wastewater network
3. Greater public contribution to private drainage

These are not dynamic options/alternatives. They are 'more of the same' and will not result/promote in resilient and sustainable infrastructure. Options should include incentivising the following alternatives by providing education and discounting associated technology:

- Incentivising rainwater roof collecting to reduce the discharges of stormwater into the system
- Incentivising domestic and commercial compostable toilets to reduce the discharges of sewage into the system
- Designating land for wetland restoration and Stormwater swales instead of hard infrastructure.

I seek the following decision from the consent authority:

A consent term of two years be granted while better alternatives can be instated.

I do not wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

I do not request pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

MR
Signature of submitter

.
Date 16/09/20

Telephone: 0211054039

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

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Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: Waihape, Rebecca on behalf of Rongowhakaata Iwi Trust
Surname: First Name(s)

Address:

No.	Street/Road	Suburb
78	Whakato Road	Manutuke

Town/City:
Postcode: 4053

Mobile:
Other phone: 06 862 8086

Email: beck.waihape@rongowhakaata.iwi.nz

2. Submission on

Application No: DW-2020-109732-00 / WD-2020-109733-00

Name of applicant: Rongowhakaata Iwi Trust

Type of resource consent applied for:

Brief description of proposed activity:

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

Please refer to attachment

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

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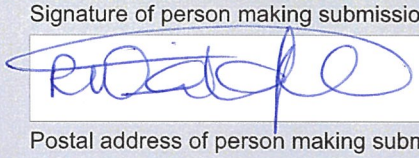
I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [ ] Would you consider presenting a joint case with others who have made a similar submission? [ ] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter



Date: 15 Sept 2020

Postal address of person making submission (if different from previous page):

78 Whakato Rd, Manutuke - Gisborne

Name and phone number (if different from previous page):

Contact person: Murray Palmer

Mobile: 021 177 1926 Other phone:

Email: murray@nmtt.co.nz

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RONGOWHAKAATA IWI TRUST

15 September 2020

Gisborne Wastewater Network – Overflow Discharges - Gisborne Reticulated Services Area Resource Consent Applications DW-2020-109732-00 / WD-2020-109733-00 (Gisborne District Council Community Lifelines)

RIT oppose the consent application in part.

The reasons for our opposition are as follows:

1. The application fails to adequately address the public health implications of the continuing discharge of untreated sewage to our urban waterways. This is evidenced by an apparent lack of direct engagement with river water users, absence of any relevant epidemiological studies, and the recognised need for a better understanding of residual contaminants, including viruses, in the sediments and shellfish.

2. This is particularly so given the urgency underpinned by the high recreational and cultural use of our urban waterways.

3. Although GDC have identified methods required to address the recurring overflows, funding allocation is inadequate to ensure that the remedial works can be carried out as rapidly as possible, given the high level of public concern that the continuing discharges elicit.

4. In the current context of the overflows to Gisborne city's rivers, the consent application for 20 years is inconsistent with C6.2.2 Policies for Point Source Discharges, Policy 9 of the Tairāwhiti Resource Management Plan:

   'Discharges of untreated sewage from the reticulated infrastructure network shall be managed to:

   a) Minimise the frequency of these discharges; and

   b) Achieve performance of an overflow occurrence of no more than 50% probability in any given year;

   c) Issue discharge permits for no longer than 5 years except where there is evidence from past performance to demonstrate that wastewater overflow events can reliably achieve the performance standard in clause b. above.'

5. In comparison, discharges of untreated sewage that are not from overflows from wastewater reticulation and pumping stations are not permitted i.e. are prohibited.

6. The application fails to adequately recognise and provide for the relationship of Rongowhakaata with our waters.

Relief sought by Rongowhakaata Iwi Trust:

1. An independent, community-based stakeholder and iwi/hapū liaison group is established to work with GDC to assist in the cessation of sewage overflows to land and the city rivers.

2. In partnership with this liaison group, further research and monitoring is undertaken to ascertain the actual risks associated with use of our urban waterways for contact recreation and shellfish gathering.

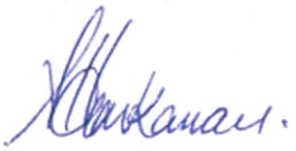
3. A review of the Drainwise Program is undertaken by a body independent of GDC.

4. Further funding is made available by GDC to more rapidly implement the current Drainwise program including any recommendations provided by the independent review that are acceptable to the stakeholder/liaison group and the wider Tairāwhiti community.

5. The consent is confined to 5 years, with an annual reporting requirement.

We wish to be heard in support of our submission.

Naku noa na



Amohaere Houkamau
General Manager

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

RECEIVED
16/09/2020 AT
1631HRS

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: Smith (Surname:) Ruby (First Name(s))

Address:

14 (No.) Seymour Road (Street/Road) Inner Kaiti (Suburb)

GISBORNE (Town/City) 4010 (Postcode)

Mobile: 022 343 1959 Other phone:

Email: ruby.smith1840@gmail.com

2. Submission on

Application No: Ref: DW 2020-109732-00 / WD 2020-109733-00

Name of applicant: GDC - Community lifelines

Type of resource consent applied for: Notified

Brief description of proposed activity: GDC - Wastewater overflow application

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

As attached

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

As attached

Office use only

Received date: ☐ Support ☐ Oppose ☐ W.T.B H ☐ N.B.H

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I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

As attached

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [x] Would you consider presenting a joint case with others who have made a similar submission? [x] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter

RNS_4

Date: 16/9/20

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

Contact person:

Mobile: Other phone:

Email:

PO Box 747, Gisborne 4040 • 06 8672049 • 0800 653 800 • notifiedrc@gdc.govt.nz • www.gdc.govt.nz • GisborneDC

GDC – Wastewater Overflow Application

2. Submission on

Clearly state which parts of the application you support or oppose or wish to have amended:

I am Ruby Smith and my property is 14 Seymour Road, Inner Kaiti, Gisborne. I am affected, I have a drain that runs through my property.

I oppose to:

- GDC application to discharge to the land and waters (rivers)
- Discharge of untreated wastewater during wet weather overflows into the rivers that has a flow on effect onto nearby creeks and drains.

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary)

The reason for making my submission is the adverse effect on the health of my family and the impacts on the environment surrounding my property and area. This includes soil, air and water quality.

- I have a shallow drain that runs through my property and is predominantly stagnant i.e. it does not have water constantly flowing through it. The only time water flows through the drain is when we have heavy rainfall and then it is prone to flooding.
- This drain is not maintained by GDC
- My property borders Ilminster Intermediate School

On my property:

- I have a native bush area which has: Kauri, Rimu, Totara, Nikau, Pohutakawa, Kawa kawa trees and fruit trees with abundance of bird life – fantails, Kererus, tuis, morporks to name a few
- *My home* overlooks this drain, there is *no assurances* that there will be no *smell or odours*
- If successful, it will have an *adverse effect* on my native bush area, garden's and bird life
- It is *unknown how long the residue of untreated wastewater* will remain in the soil and
- *The impacts on the schools* (Ilminster Intermediate and Te Wharau Primary school), the Seymour Road *properties* that boundaries this drain and *the public* that use the footbridge at the end of Seymour Road.

I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

I oppose to the discharge of untreated wastewater into the rivers and the application of a resource consent for 20 years. This is an application by GDC to discharge untreated wastewater into the rivers without any assurances.

I want a committed Council that ensures we have pristine rivers and support the ecosystems in our environment and community.

Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

Te Kaunihera o Te Tairāwhiti GISBORNE DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: Pehimana Brown on behalf of Te Aitanga a Mahaki Trust
Surname: First Name(s)

Address:

No. | Street/Road: Level 1 TROTAK Building Corner Reads Quay and Lowe Street | Suburb

Town/City | Postcode

Mobile: 0274572692 Other phone:

Email: pehibrown@gmail.com

2. Submission on

Application No: DW-2020-109732-00 / WD-2020-109733-00

Name of applicant: Gisborne District Council - Community Lifelines

Type of resource consent applied for: DISCHARGE TO WATER / DISCHARGE WASTEWATER TO LAND

Brief description of proposed activity: Discharge of untreated wastewater from the Gisborne wastewater network

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

We oppose the the following parts of the application, being the;
Discharge of untreated wastewater from the Gisborne wastewater network.
Lack of funding priority and commitment from the GDC to implement the promised improvements.
Proposed duration of the consent.
Proposed duration to implement improvements promised under the Drainwise Program.
Inconsistency with the Point Source Discharge Policy 9 (c) in the Tairawhiti Resource Management Plan [Issue permits no longer than 5 years]
Failure to adequately recognise and provide for the relationship between affected Hapu and Iwi with their tupuna awa
We support the analysis and recommendations provided in the KIWA Group Report
We support the Wastewater Management Committee overseeing the implementation of these [KIWA Group] recommendations

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

Refer to previous objections and submissions from Te Aitanga a Mahaki and Te Runanga o Turanganui a Kiwa and our Iwi relations.

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I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

To genuinely engage with affected Hapu and Iwi to develop conditions that address our concerns outlined above.

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [ ] Would you consider presenting a joint case with others who have made a similar submission? [ ] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter

Date: 17/9/20

Postal address of person making submission (if different from previous page):

Email please

Name and phone number (if different from previous page):

Contact person: Ian Ruru [signed]

Mobile: 0273573937 Other phone:

Email: ianruru@gmail.com

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Submission on

Resource Consent Application

Form 13
Under Section 96 of the Resource Management Act 1991.

GISBORNE DISTRICT COUNCIL
RECEIVED
15 SEP 2020
Time: 1559
CUSTOMER SERVICES

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: **Ward, Gillian**
Surname: First Name(s)

Address:

695	**Aberdeen Road**	**Te Hapara**
No.	Street/Road	Suburb
Gisborne		**4010**
Town/City		Postcode

Mobile: **027 645 6880** Other phone: **06 867 4591**

Email: **grass.hopper@xtra.co.nz**

2. Submission on

Application No: **DW-2020-109732-00and WD-2020-109733-00**

Name of applicant: **Gisborne District Council**

Type of resource consent applied for: **Non-complying Activity**

Brief description of proposed activity: **discharge of untreated wastewater**

☐ I support the application ☑ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

The time period of the applciation, 20 years.

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

On separate page

~~progress towards keeping stormwater out of the sewerage system.I would like to have seen this resource consent application more widely socialised~~

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Received date: ☐ Support ☐ Oppose ☐ W.T.B H ☐ N.B.H

I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

Reduce the period of the application to five years.

Please tick:

- ☐ I wish to speak at the hearing in support of my submission
- ✓ Would you consider presenting a joint case with others who have made a similar submission? ✓ Yes ☐ No
- ☐ I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter

Date: 15/09/20

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

Contact person:

Mobile: Other phone:

Email:

The reasons for making my submission are

The period of 20 years for emergency sewerage discharges is unnecessarily long. The education campaign, "Only flush the three "P"s" is a good one. More work needs to be done so that the community is getting this right and blockages are avoided. The Drainwise Programme is making progress towards keeping stormwater out of the sewerage system.

I would like to have seen this resource consent application more widely socialised. The planner has engaged with many groups, but has not communicated with residents, marae, or schools which are adjacent to the rivers and streams. This engagement could have been used as an education programme as well – no fat or wet wipes down the drain.

I have lived beside the Taruheru River for 20 years, opposite the Mangapapa Stream confluence and adjacent to the Roebuck Road Bridge. When you live beside the river you are always aware of it – the tides, changes with increased rainfall, the birdlife and river life, and the rubbish and debris in the river. Family and friends have rowed, kayaked, swum, fished, collected rubbish, and explored the riverbanks, while we have lived beside it. We have always been aware of when sewerage has been released into the river.

Tairawhiti 2050, our spatial plan, has aspirational goals for improving the connections between the city and the rivers and beaches with a shared space proposed for the CBD and a linear park proposed for Grey Street. The rivers and beach are lovely and are an integral part of the city. Already residents and visitors relate to and appreciate the rivers and beach through using the pedestrian bridges, the riverside and beach walkways, as well as other less formalised paths e.g. along the edge of Nelson Park beside the Taruheru River, and of course walking and playing on the beach, and in the sea. Before long there will also be a riverside cycle/walkway along the Taruheru River to Campion College.

Whaia Titirangi are starting restoration of the native vegetation along Kopuawhakapata Creek, and Waikanae Stream has received a huge investment in restoration in recent years. These waterways, as well as Mangapapa Stream, Mangamutu Stream, Hapara Stream, Waiteata Stream and others will receive care from the community as well in time.
The rivers and streams should not be seen as an extension of the sewerage drain system any longer.

The map included in the application is of low resolution and is difficult to read. The street pattern which the drainage plan is superimposed onto is not able to be viewed. I found the insert of the Grundy Road bridge over Mangapapa Stream difficult to interpret despite my familiarity with this place. Labelling would have been helpful.

Submission on

Resource Consent Application

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16/09/2020 AT
1531HRS

Te Kaunihera o Te Tairāwhiti
GISBORNE
DISTRICT COUNCIL

Form 13
Under Section 96 of the Resource Management Act 1991.

A copy of your submission must also be given to the resource consent applicant as soon as possible.
All information provided in your submission is available to the public (on request).

1. Person making submission

Name in full: Webb (Surname) Gordon Richard (First Name(s))

Address:

18 (No.) 18 Seymour Road (Street/Road) Kaiti (Suburb)

Gisborne (Town/City) 4010 (Postcode)

Mobile: 0274493287 Other phone:

Email: spiderw@xtra.co.nz

2. Submission on

Application No: DW 2020 109732 & 109733

Name of applicant: Gisborne District Council

Type of resource consent applied for: Discharge of Wastewater

Brief description of proposed activity: Wastewater overflows during wet and dry weather

☐ I support the application ✓ I oppose the application ☐ I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

1. I oppose the discharge from the manhole at SEYSM015 as the natural path of the overflow is overland along the berm of Seymour Road before it enters the Owen Drain.
2. I oppose overflow discharges from the reticulated network into the City Rivers

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

See attached page

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I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

Decline the applications. If the consent authority is minded to grant the consents it should include an agreed plan of works improvements and a strict timeline to implement the same.

Please tick:

- [x] I wish to speak at the hearing in support of my submission
- [ ] Would you consider presenting a joint case with others who have made a similar submission? [ ] Yes [ ] No
- [ ] I do not wish to speak at the hearing in support of my submission

3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter

Date: 16 September 2020

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

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Submission on Resource Consent Application

Form 13

Under Section 96 of the Resource Management Act 1991.

The reasons for making my submission are:

1. The discharge from the manhole on Seymour Road travels along a shallow swale in the berm which is adjacent to the carriage way and the foot path. Both are extensively used by pedestrians. It is inappropirate to have such an open discharge in a populated area.

2. The Applicant needs to remedy, as priority, the discharges of untreated wastewater into City Rivers which is potentially unhealthy and has an adverse effect on the receiving environment. Such discharges have been occurring for nearly 40 years. The Applicant needs to prioritise its response to these discharges and find a prompt solution, not one that allows a 20 year consent. The Applicant should divert funding from that being applied towards the wastewater treatment plant upgrades towards the underfunded DrainWise programme.

To Gisborne District Council the Consenting Authority

Name of Submitter

Zane (Sandy) Roger Blake Gibson

This is a submission to the proposed and following resource consent:

Discharge from the Waste Water network into Taruheru, Turanganui and Waimata Rivers.

I am not a trade competitor for the purposes section 308B of Resource Management Act 1991.

The specific parts of the review and any new conditions proposed that my submission relates to are:

The allowable and if granted the number of permissible discharges into the three Rivers.

My submission is

GDC's Drainwise Program is fundamentally flawed. It assumes that the bulk of the water entering our Wastewater system comes in through surface water entering Gulley Traps and illegal connections on private property. Work being conducted by GDC is based on this assumption and as a result it has achieved little in lessening the amount of water entering the Wastewater system.

The Drainwise program is critical to the reduction of wet weather wastewater flows and the resultant private property overflows and river discharges.

It is a simple matter to prove to GDC Wastewater management That what I say to be correct. This can be done by comparing dry condition Wastewater flows to wet condition Wastewater flows and by elimination Gulley Trap ingress by visual inspection. Illegal connections can be eliminated through smoke testing.

When setting the number of legally allowable discharges our community must set them at a level to encourage review of such flawed current practices but at the same time set them at a level that is realistic and workable.

GDC are currently conducting a public campaign to convince us that blockages have increased as a result of Lockdown and that these blockages are responsible for the need for river discharges. I am skeptical of the intent of this public relations campaign and are fearful that it is being used to maneuver the community in allowing GDC greater discharge to river tolerance.

Any legal discharge allowances cannot be set in a way that they can be manipulated by GDC where they can call some discharges as a result of blockages and some as a result of wet weather events.

I seek the following decision from the consent authority:

I seek that the consenting authority give GDC the authority to discharge wastewater into the Taruheru, Turanganui and the Waimata rivers at the following number of allowable daily discharges.

That the total number of allowable discharges be set at 3 days per year, whether the cause being through wet weather events or through blockage, this reducing by one a year to no discharges after three years. If there is a discharge to any of those rivers on any day that is one of the allowable discharges used up. The consent to be worded in such a way that there is no confusion as to its intent.

This reducing consent will allow time for GDC to reexamine their Drainwise Program, which is fundamentally flawed, and give GDC time to remedy our network.

I wish to be herd in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

Zane (Sandy) Gibson

17th August 2020

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