## **Resource Consent Application**



Form 13

1. Z. \$

Submission on Resource Consent Application - August 2020

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. 0 All information provided in your submission is available to the public (on request).

1. Person makin	g submission				
Name in full: AINSWORTH MARGOT			RGOT		
Suma Address:	Sumame: First Name(s)				
547B Ba	ck Ormond Road		an mark mention and a second and a second	Hexton	
No, Str	eet/Road	t the second	·······	Súburb	
Gisborne				4071	
Town/City	·····			Postcode	
Mobile: 0211614729	and the second		Other phone:		
Email: margot.ains	worth@outlook.co.n	5			
2. Submission of	n				
Application No:	DW-2020-109732-0	0 / WD-2020-109733-00			
Name of applicant:	Gisborne District Co	ouncil - Community Lifelines.			
Type of resource co	nsent applied for.	DISCHARGE TO WATER / D	ISCHARGE WASTEWATER 1	'O LAND	
Brief description of I	proposed activity;	To discharge untreated wastew	ater into local rivers		
I support the ap	plication 🗸 I o	ppose the application	I am neutral to the application	on (neither support or oppose)	
		ion you support or oppose			
Stream and Waimata (wet weather overflow 2. Oppose the 20 year people, the flora and fa	River at present and i s) and in cases where term of consent appli auna, the rivers, stream	nto the future, even when the there is a malfunction or bloc cation. It is unacceptable, abh ms and residing fish/shellfish s	wastewater network has been in kage of the network system.	, i i i i i i i i i i i i i i i i i i i	
20 year ine Enstancest Office use only	dirates nut		fem dischargi-	g is unacceptable.	
Received date:		Suppo	rt Oppose W.T.B	H N.B.H	

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

I wish the Gisborne District Counc	il to make the following decision (give details, including the nature of any conditions sought):
resource consent to roll over for anot 2. Use of a potential storage system if individual regional local councils and shared approach so all parties can be 3. Lobbying community Trust Tairav financial support specifically for cour investment specific funding under th	0 years that is communicated to the community about what it is doing going forward, not just applying for a her 20 years. Making this plan TOP of the agenda and doing something about it NOW!! needed in the interim whilst wastewater is being upgraded. Gather and utilise information from other iwi as to how they are addressing community wastewater issues, support and encourage a multilateral heft from assisting each other whether they are deemed a large, medium or small regional council. thit ( their vision is to assist in creating a community that is positive, prosperous and attractive), for possible cil wastewater projects, and to make sure GDC has put forward a strong case to government for wastewater e Three Waters Reform review to not only lift the environmental performance and transparency of but to meet modern world standards and managing wastewater and stormwater in environmentally
I wish to speak at the hearing Would you consider presentin	in support of my submission g a joint case with others who have made a similar submission? Yes No earing in support of my submission
I wish to speak at the hearing Would you consider presentin ✓I do not wish to speak at the h 3. Signature	g a joint case with others who have made a similar submission? Yes No earing in support of my submission
Would you consider presentin Vould you consider presentin Signature Signature of person making subm	g a joint case with others who have made a similar submission?
I wish to speak at the hearing Would you consider presentin ✓I do not wish to speak at the h 3. Signature	g a joint case with others who have made a similar submission? Yes No earing in support of my submission ssion or person authorised to sign on behalf of submitter
I wish to speak at the hearing Would you consider presentin ✓I do not wish to speak at the h 3. Signature Signature of person making subm	g a joint case with others who have made a similar submission? Yes No earing in support of my submission
I wish to speak at the hearing Would you consider presentin ✓I do not wish to speak at the h 3. Signature Signature of person making subm	g a joint case with others who have made a similar submission? Yes No earing in support of my submission ssion or person authorised to sign on behalf of submitter Date: 14 · 01 · 2020
I wish to speak at the hearing Would you consider presentin ✓ I do not wish to speak at the h 3. Signature Signature of person making subm WauuwA Postal address of person making	g a joint case with others who have made a similar submission? earing in support of my submission ssion or person authorised to sign on behalf of submitter Date: 14 · 01 · 2020 submission (if different from previous page):
I wish to speak at the hearing Would you consider presentin I do not wish to speak at the h Signature Signature of person making subm Maxward Postal address of person making address of person making	g a joint case with others who have made a similar submission? earing in support of my submission ssion or person authorised to sign on behalf of submitter Date: 14 · 01 · 2020 submission (if different from previous page):
I wish to speak at the hearing Would you consider presentin I do not wish to speak at the h Signature Signature of person making subm	g a joint case with others who have made a similar submission? earing in support of my submission ssion or person authorised to sign on behalf of submitter Date: 14 · 01 · 2020 submission (if different from previous page):

## **Resource Consent Application**





HEXTON

Suburb

Postcode

4071

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: AINSWORTH Surname: First Name(s) Address: 547B BACK ORMOND ROAD No, Street/Road

26

Town/City Mobile: 0279300458

**GISBORNE** 

Other phone:

Email: rachelainsworth2@gmail.com

#### 2. Submission on

Application No:	DW-2020-109732-00 / WD-2020-109733-00
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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 wastewater overflows to water/land and CMA

	I support the application	$\checkmark$	I oppose the application		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. The 20 year term of consent.

2. Discharging in dry events

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

Please see attached.

Office use only

Received date:

Submission on Resource Consent Application - August 2020

Support Oppose W.T.B H N.B.H

Page 1 of 2

I wish the Gisborne District Council to make the followir	ng decision (give details	s, including the nature of an	v conditions sought):
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I wish the Gisborne District Council to mal	e the following decision (give details, including the nature of any conditions sought)	:
<ol> <li>Change the term to 3-5 years.</li> <li>Do not allow for discharging in dry events.</li> <li>Invest in storage facilities</li> <li>Investigate stormwater issues, fix them</li> </ol>		
Please tick: I wish to speak at the hearing in support Would you consider presenting a joint ✓ I do not wish to speak at the hearing in	case with others who have made a similar submission? Yes	No
3. Signature		
Signature of person making submission or Postal address of person making submission	person authorised to sign on behalf of submitter Date: 15/09/202 on (if different from previous page):	D
Name and phone number (if different from Contact person:	previous page):	
Mobile:	Other phone:	
Email:		

Yes No

Reasons for making my submission.

GDC have been discharging wastewater/sewerage into our rivers and streams for years and it was agreed that by 2020 they would not be able to discharge any further. Allowing these discharges to continue any further directly goes against Gisborne's values, vision and community health/wellbeing. Not only that, it goes against the Resource Management Act 1991 and New Zealand's plan to restore and protect New Zealand's freshwater. The key issues the Government want to address include stopping further degradation to NZ's freshwater resources, start making IMMEDIATE improvements so that water quality is improving within **5 years** and reverse past damage to bring NZ's freshwater resources, waterways, and ecosystems to a healthy state within a generation.

I understand that change isn't going to happen overnight. There is some serious infrastructure that needs to be replaced/upgraded and you cannot just stop the overflow as its either it discharges to the environment or it goes back up the pipe to houses. However 20 years is not an acceptable timeframe.

3-5 years is more palatable as this shows that the environment is important and something will be done about it. 20 years indicates it is not a priority when it should be. Even if it is working towards an interim measure such as investing in some type of storage facility/tank that could capture the overflow rather than discharge to our rivers/streams. Once it is captured, it could either be suckered out/transferred to the wastewater treatment plant, or when the pipes are not inundated, it could be pumped gradually back to the treatment plant. It could be that across the overflow points, dependant on the levels of overflow, a certain number/size of tank/s are installed. As stated in Beca's report, storage options are "prohibitively expensive" and yes, cost is a large issue. However, this it should be our priority when it comes to protecting not only our rivers and streams but our community. Our environment should be the priority.

Discharging in dry events is not acceptable. Very few ecological environments can handle a discharge of high levels of effluent with no flushing/flow in an ecosystem. Our rivers are already in a bad state. We should not be exacerbating their decline, we should be working towards improving and protecting our mauri, not adding to it's degradation.

Just because we are little, doesn't mean we can't be ahead of other regions/Councils. Let's show them we care. Gisborne District Council's vision includes "Tairāwhiti Wawata - First place for the environment, culture and heritage..... A place where people want to be and are proud to live..... A place where we care for our environment as an integral part of our lifestyle". I have spent the majority of my life in Gisborne. It is my home. I want to be proud of my home, my community and my Council, our kaitiaki. I want to live in a place where we care for our environment. By allowing this discharge to occur for the next 20 years, this is not caring for our environment and it's certainly not Kaitiakitanga.

## **Resource Consent Application**

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



Reference Number: Submitted On:

## Person making submission:

Surname First Name(s) Address Mobile Other phone Email Submission on:

#### Application No Name of Applicant Type of resource consent applied for Brief description of proposed activity

Position on application

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

The reason for making my submissions are (briefly describe the reasons for your views):

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

RCS200920955 15/09/2020 07:21 p.m.

Bidois Ngarangi 771 Gladstone Road, Te Hapara, Gisborne 4010 0211827694

ngarangib@outlook.com

#### DW-2020-109732-00 / WD-2020-109733-00 Gisborne District Council - Community Lifelines DISCHARGE TO WATER / DISCHARGE WASTEWATER TO LAND

Gisborne District Council (the Applicant) has lodged an application for the discharge of untreated wastewater from the Gisborne wastewater network within the Gisborne Reticulated Services Area in situations where the wastewater network has been inundated with rainwater in heavy rain (wet weather overflows) and also in cases where there is a malfunction or blockage in the network (dry weather overflows). The discharge application includes discharges to land and water (rivers) and to the Coastal Marine Area (CMA), although direct discharges to the CMA are not anticipated.

I oppose the application

I oppose the timeframe for which the Council has applied for. The council consent should be limited to five years only.

This is because the council have had decades to resolve the problem of untreated effluent into our rivers and have not put enough resources into this. Giving them 20 more years just means they will continue to not deal with the problem for 2 more decades. In the meantime they have poured millions into walkways and cycleways (nice to haves). I submit that they be given five years only to ensure the council is very focused on the issue and gives it the urgent attention it deserves. Continuing to pour sewage into our city waterways (which are enjoyed by a significant portion of the public & tourists) is unacceptable in this day and age. It's quite disgusting! It can be likened to the environmental damage that the forest companies have done to our waterways also. Water is a precious gift that should not be used as a rubbish tip - or worse!

Further, with climate change, there is no guarantee that the water levels will remain as they are in the next 20 years, if they don't how much sewage can the waterways bear?

Fix the problem urgently!! DOn't wait for another 20 years.

I wish to speak at the hearing in support of my submission No Would you consider presenting a joint case with others who No have made a similar submission?

## Confirmation

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

### **Resource Consent Application**

#### Form 13

Under Section 96 of the Resource Management Act 1991.

GISBORNE DISTRICT COUNCIL RECEIVED 16 SEP 2020 LINE REPUBLIC 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 Grawford Surname: Janet Lesley First Name(s) Name in full: Address: Dominey St Street/Road 9 Inner Karti No. GISborne 4010 Town/City Postcode 021 130 1443 Mobile: Other phone: Ian. crawford e +tra. co. nz Email: 2. Submission on DW-2020-109732-00/WD-2020-109733-00 **Application No:** Gisborne District Council Name of applicant: Type of resource consent applied for: Discharge Brief description of proposed activity: Discharge untreated wastewatert I oppose the application I am neutral to the application (neither support or oppose) I support the application Clearly state which parts of the application you support or oppose or wish to have amended: With respect to the Seymour (Turene PI overflow point, I seek specific analysis of the effects of an overflow on the epheneral stream located behind Seymour Red properties a flowing to Wainata River via Maria Sweppe. This stream his some recreational usage The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary): The general rouths of maintaining at other locations need to be applied in the contact of this stream and its human a physical environment. In the absence of a specific stricting of this stream and the effects of overflow, it is hard to know whether there is cause prevent. (see apendit)

Office use only

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

to grant consert: Decline 05 conditions requiring the establishment of a [Twense Plove flow reference group and water of a detailed plan for the management epheneral for with particular attention to mose Seynow 1 preparatio the d

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?

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

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

Date: 14/09/2020

Yes No

Name and phone number (if different from	ı previous page):	
Contact person:		
Mobile:	Other phone:	
Email:		

#### Appendix to submission of Janet Lesley Crawford

I live next to the ephemeral stream flowing from Seymour Road to the Waimata River. Most of this stream is daylighted however there is a section of pipeline under Marian Drive.

In the company of 4 boys aged 5-8 years who live in Dominey Street, I often walk up and down the stream, build dams and play games along the banks and in the Ngahere.

Residents are planting native trees and shrubs in the unformed road reserve linking Dominey Street to Seymour Road.

Parts of this stream are in private ownership however there is a drainage (?) reserve behind 18-20 Seymour Road and in the section north of the Dominey St - Seymour Road footbridge running through to the Waimata River. I do not know whether the alignment of this drainage reserve corresponds to the stream channel. There is a mixture of exotic and native trees and shrubs and a variety of pest plants along the banks. It is becoming more difficult to walk along the bank and in the stream channel between the footbridge and Marion Drive due to overgrowth and other obstructions. Household rubbish and construction debris is strewn along the banks and in the channel along its full length.

There is a small pool that stays wet over summer within the property at 7 Dominey Street. There is no fish passage upstream beyond this point due to a change in level (c. 1m) so they are trapped in this pool during summer. We have spent ages watching the small fish that have lived in it for the last year or so. When my neighbour's cat caught one of these fish last year, I identified it as a banded kokopu. There are no fish there at present.

Stormwater runoff from residential properties flows into this stream and there is a stormwater pipe discharging into it within the Ngahere at Te Wharau/Ilminster Schools.

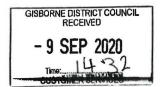
After a decent rainfall, there is a distinct whiff of sewage emanating from this stream which lasts for a day or so.

I accept the need for occasional wastewater overflows to our rivers – reluctantly. In my opinion, there is an opportunity to remediate the stream channel and banks of this stream as part of the Drainwise/overflow programme. Involving the residents makes sense given the need to maintain this stream long term.

Jan Crawford

14 September 2020

Ja Gaylor A



To: Gisborne District Council

SUBMISSION regarding objection to discharging untreated wastewater DW-2020-109732-109733-00

OBJECTION

1 To the Gisborne District Council's proposal to discharge untreated wastewater into the open drain between 12 and 14 Seymour Road, Gisborne, and along the back of house sections in Seymour Road.

2 Ilminster and Te Wharau Schools have their back boundaries on the discharge area.

3 The open drain between 12 and 14 Seymour Road is approximately 1.7 metres wide and 1 metre in depth. When there has been heavy or prolonged rain the flow has spilled over. Any extra deliberate release could cause a quick overflow.

4 The open drain is directly between 12 and 14 Seymour's daily living area and visual outlook.

5 Any untreated water is not a healthy or desirable answer for disposal in a residential or school area.

6 Having lived at 12 Seymour Road for over 50 years, regular sightings have been observed of visits made by Council drainage workers to service Turenne Street/Seymour Road ongoing trouble spots. This is not a wet weather problem.

7 IN CONCLUSION the Council limiting its proposal to a 20 year period is a temporary fix and not a permanent answer and amounts to what would be a 70 year old problem still at the end of the further term.

las Xogr B2 Duys

Colleen and Beverley DWYER Houseowners 12 Seymour Road Inner Kaiti Gisborne 4010 E-mail: bcdwyer@xtra.co.nz 27 August 2020

Submission on the Resource Consent Application DW-2020-109732-00 / WD-2020-109733-00 to DISCHARGE TO WATER / DISCHARGE WASTEWATER TO LAND

**Gisborne District Council - Community Lifelines** 

Emailed to: notifiedrc@gdc.govt.nz

From: Forest & Bird PO Box 631 Wellington 6140 Attn: Tom Kay t.kay@forestandbird.org.nz



Royal Forest and Bird Protection Society of New Zealand Inc.

Head Office: PO Box 613 Wellington New Zealand

**P**: +64 4 3857374

www.forestandbird.org.nz

#### INTRODUCTION

- The Royal Forest and Bird Protection Society of New Zealand (Forest & Bird) is New Zealand's largest independent conservation organisation. It is independently funded by private subscription, donations and bequests. Forest & Bird's mission is to protect New Zealand's unique flora and fauna and its habitat. Key matters of concern therefore relate to the protection of ecological values, particularly the sustainable management of New Zealand's indigenous biodiversity, natural landscapes, and publicly owned land, rivers, and lakes.
- 2. Forest & Bird are opposed to this resource consent application.
- 3. Forest & Bird wishes to speak to this submission.
- 4. We would consider presenting a joint case with others who have made similar submissions.

#### SUBMISSION

5. The objective of the National Policy Statement for Freshwater Management 2020 (NPSFM) is:

To ensure that natural and physical resources are managed in a way that prioritises:

- a) first, the health and well-being of water bodies and freshwater ecosystems
- b) second, the health needs of people (such as drinking water)
- c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
- 6. Policy 1 of the NPS requires that "freshwater is managed in a way that gives effect to Te Mana o te Wai."

- 7. Policy 3 of the NPS requires that "freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments."
- 8. Policy 5 of the NPS requires that "freshwater is managed... to ensure that the health and wellbeing of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved."
- 9. Policy 9 of the NPS requires that "the habitats of indigenous freshwater species are protected."
- 10. Part 2 of the Resource Management Act requires that council manage:

the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.
- 11. Forest & Bird consider that the granting of a resource consent to discharge untreated wastewater to the environment, particularly to freshwater and coastal environments, is inappropriate and inconsistent with the above provisions of the NPSFM and the RMA, as well as the other guiding direction in the NPSFM, RMA, the Tairāwhiti Resource Management Plan, and New Zealand Coastal Policy Statement.
- 12. This sort of approach to waste management is not sustainable, is not appropriate, and fails to meet the legislative requirements of New Zealand's environmental law.
- 13. Further, discharging untreated wastewater to the environment is an outdated method of dealing with potential pollutants that should not be allowed in a country with ready access to developed systems of infrastructure and waste management.
- 14. It also fails on moral grounds to do the right thing by our environment and the public, in particular our younger generations, who deserve and expect better than this.
- 15. A recent survey of youth in New Zealand found that "many students saw the future as bleak and felt that their generation was inheriting a broken world... Some expressed a sense of facing a hostile world with insufficient adult support. Others felt older generations had created a mess and were leaving it to young people to find solutions... Young people want action for a brighter future including... action to address... urgent environmental issues."<sup>1</sup>
- 16. One response to the survey question "What do you think should be changed to support young people in New Zealand better?" was "...how polluted the environment is, I feel like this is what

<sup>&</sup>lt;sup>1</sup><u>https://static1.squarespace.com/static/5bdbb75ccef37259122e59aa/t/5f3394a2654885030c051243/159721</u> 5912482/Youth19+Youth+Voice+Brief.pdf

is making our country toxic and you can't really be happy if the environment is sad." (Pacific female, decile 1, age 15).<sup>2</sup>

- 17. We cannot continue to grant consents that do not meet the legislative requirements to protect the environment, that do not meet the standards achievable in a developed country with access to modern infrastructure, and that do not meet the moral expectations and desires of those generations who will bear the brunt of the ongoing issues we create.
- 18. We must set up systems that enable for a transition to a more sustainable way of managing our impacts moving away from 'managing the adverse effects of our activities' to ensuring that everything we do has a net benefit on the environment. We have no option but to restore the environment in everything we do.

#### **RELIEF SOUGHT**

- 19. Forest & Bird appreciate that declining the consent application is likely to mean that overflows will continue to occur without consent and with no remediation.
- 20. For that reason, we seek that a shorter duration consent be imposed by the decision maker. We suggest five years as the maximum that should be granted for this sort of activity.
- 21. The consent should also be clear on the range of actions and measures required to progressively reduce overflow frequency, volume and risk; and to manage the risks and environmental effects of any overflows where these occur out of necessity. Remediation work should occur whenever an overflow event occurs.
- 22. The consent should include conditions that require, over the period of that 5-year consent, work to be undertaken to upgrade infrastructure to manage wastewater without overflows, and to prepare a new resource consent application to be lodged for a long term, sustainable system in which there will be no overflow discharges of untreated wastewater to the environment.

Thomas Kay Freshwater Advocate Forest & Bird

<sup>&</sup>lt;sup>2</sup>https://static1.squarespace.com/static/5bdbb75ccef37259122e59aa/t/5f338e4cfb539d2246e9e5ce /1597214306382/Youth19+Mental+Health+Report.pdf

#### RECEIVED 16/09/2020 AT 1630HRS



# SUBMISSION ON AN APPLICATION FOR RESOURCE CONSENT UNDER SECTION 96 (1) OF THE RESOURCE MANAGEMENT ACT 1991

#### To: Gisborne District Council

#### Submitter: Population Health-Hauora Tairāwhiti

- 1. This is a submission on an application by Gisborne District Council for a Resource Consent for discharge permit
- 2. The application is to: Discharge untreated wastewater from the Gisborne wastewater network, within the Gisborne Reticulated Services Area, in situations where the wastewater network has been inundated with rainwater in heavy rain (wet weather overflows) and also in cases where there is a malfunction or blockage in the network (dry weather overflows).
- 3. The specific parts of the application that this submission relates to are those parts which address these topics
  - Duration of consent page 148 AAE part 1
  - Reporting Table 13 and 14 pg 68-69 AAE Part 1
  - Adequacy of any proposed conditions of consent in the event consent is to be granted.
- 4. This submitter supports grant of consent for the application, provided any conditions of consent are adequate to protect the health of people and communities. This should include a long-term aim to have no discharges.
- 5. The reasons for this submission are to promote the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and in the Tairāwhiti, obligations carried out under contract by Population Health, under Crown funding agreements, on behalf of the Tairāwhiti District Health Board.

The Ministry of Health requires this submitter to reduce potential health risks, by means including submissions on resource consents, to ensure the public health significance of potential adverse effects are adequately considered by consent authorities.

6. The decision sought is the imposition of adequate conditions related to the control of discharges in the event that the application is granted, which are here generally described as appropriate as and no less stringent than the provisions of the relevant New Zealand Standards or guidelines.

#### We would like

- 1. The duration of the consent to be reflected in the objectives and targets. This could mean the consent period was reduced to 10 years or retain the 20 year duration and set further longer term reduction targets.
- 2. A review of the effectiveness of each Drainwise strategy after the 10 year period if the targets and performance measures are not being met.

#### Service and performance, objectives and targets

- 1. We would like these documents to be consistent in approach and clear about measures
  - Table 13 -targets are the figures in this table per year or over the time period?
  - Placing overflow information under the one heading (system and adequacy) and being clear about what is wet weather and dry weather would add clarity



2. The targets to reduce the stormwater inflow into the wastewater network only stipulate an inspection. We wish this to be extended and read inspected and an implementation plan developed to address any identified problems.

#### Annual Reporting

- 1. We would like to have individual incidents of overflows reported to stakeholders in the form of an incident report to be provided 30 days after the event. The report would contain a summary of any contributing factors and any subsequent actions that have or need to be undertaken.
- 2. We would like annual reporting to include an analysis of overflow events looking at trends and causal factors.
- 3. We would like an analysis of trends with complaints and customer satisfaction reporting.

We also note that tangata whenua have an appropriate objection to any discharge, and that the council will be working towards this as a long-term goal.

- 7. This submitter is not a trade competitor of the Applicant for the purposes of s.308B of the Act.
- 8. I <u>do not</u> request, pursuant to s.100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.
- 9. This submitter will not wish to be heard in support of this submission.
- 10. The submitter is willing to consider participation in any pre-hearing conferences, or mediation.

Dated at Gisborne on 16<sup>th</sup> September 2020

Dr. Osman David Mansoor, Medical Officer of Health For and on behalf of Population Health Hauora Tairāwhiti Address for service Attention: Dr. Osman Mansoor Postal address: P O Box 7001, Gisborne 4010 Email: Osman.Mansoor@tdh.org.nz 06 8690500