

**Submission
to the
Board of Inquiry
on the
National Policy Statement
Freshwater Management**

**Kerry Hudson
7 September 2009**



Submission Content

- National issues
- Features of the Gisborne Region
- Current water management
- Implications of the NPS

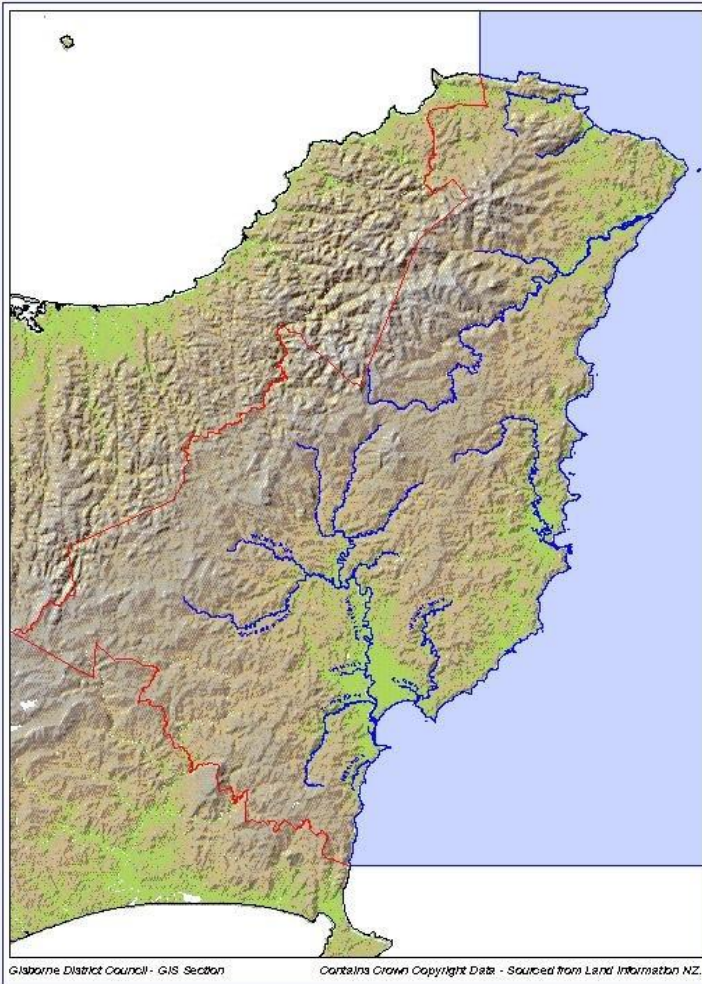


National Issues

- Over allocation of freshwater
- Declining water quality
- Gisborne context
 - Sustainable allocation
 - Water quality is not declining



Gisborne Region (1)



- Main catchments
 - Waipaoa
 - Waiapu
- Arable land 11%
- Extensive hill country farming and forestry
- Rainfall
- Natural fertility



Gisborne Region (2)

- Fine textured soils
- Focus on erosion control



Gisborne District Council

- Unitary Authority
- RPS and several regional plans
- No water allocation plan
- Focus on land management
- Water quality dealt with in Discharges Plan

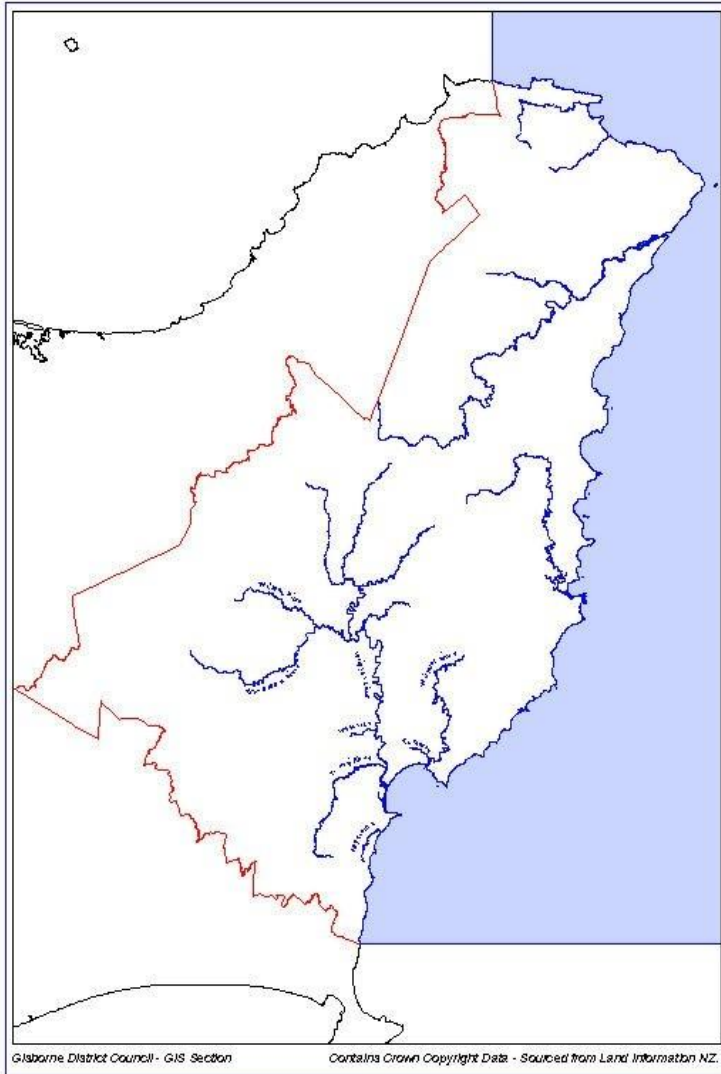


Water Allocation

- 150 takes for region
- Surface and groundwater takes
- All takes metered
- All applications notified
- Consent duration of 5 years
- Restrictions based on traditional practical measures



Waipaoa Catchment

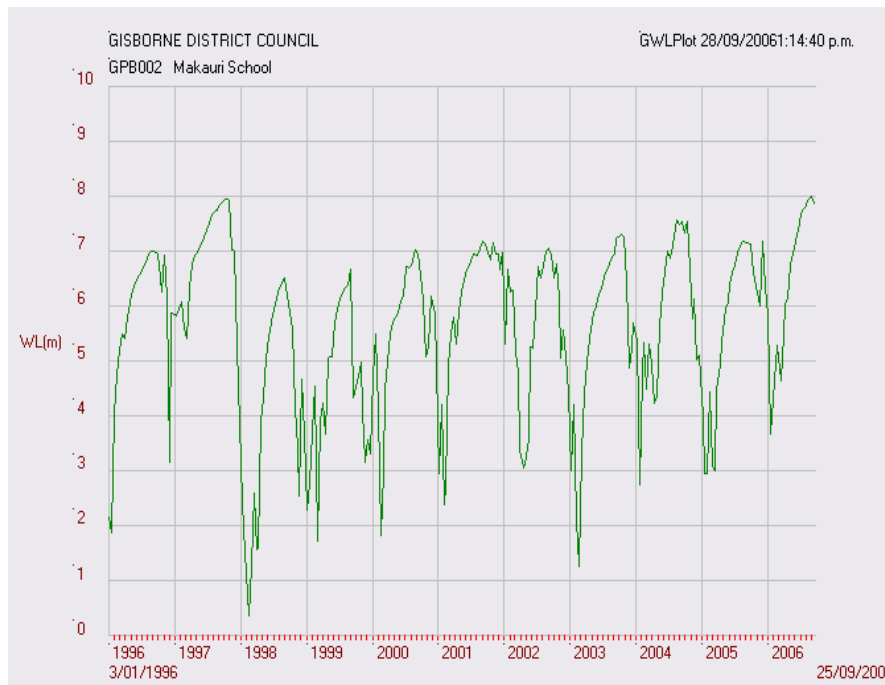


- All irrigation takes for Poverty Bay Flats
- Waipaoa River rises in western hill country with reliable rainfall
- Recharge of aquifers from river gravels
- Takes mainly seasonal



Groundwater Recharge

- Long-term data shows only seasonal changes
- Aquifer levels sustainably managed





NPS Impacts

- Natural state of water
 - High natural concentrations of sediment
- Riparian plantings
- Sources of debris
- Takes and use
- Perceptions



Definitions

- Notable values
- Land-use development
- Outstanding and degraded freshwater resources



Benefits and Costs

- Assumptions in NPS
 - over-allocation
 - declining water quality
- Estimated costs too broad brush and significantly under-estimated e.g. riparian management
- Some mitigation options impractical



Mitigation Options

Example: Gully Planting

- Controls erosion
- Intermittent flows
- Still accessed by stock
- Difficulties fencing erosion-prone gullies
- Micro-organisms still enter water courses



Timeframes

- Regional Policy Statement
 - Two years from commencement of NPS
- Regional and District Plans
 - Within 40 working days of RPS becoming operative
- Timeframes unrealistic for Gisborne
 - Allocation is managed sustainably
 - Water quality is not declining



Setting Environmental Flows (1)

Policy 1 (c)

- Setting of environmental flows and levels in regional plans for all freshwater resources
- Instead of all, perhaps where existing takes and future demand is likely



Setting Environmental Flows (2)

Policy 2 (b)

- Setting of environmental flows and levels for
 - Outstanding
 - Degraded and
 - Other freshwater resources of the region **with existing takes**



Swimmability



- Micro-organism reductions difficult to achieve
- High natural sediment contents
- Excellent beaches nearby

Conclusion: Requested changes

- Stringent timeframes difficult
- Definitions need clarification
- Benefits and costs need careful consideration
- Setting of appropriate environmental flows and water levels
- Swimmability needs to be considered in a regional context



Conclusion: Objectives Supported

GDC supports objectives relating to:

- Integrated management of water quality
- Sustainable management of water demand
- Efficient use of water resources
- Monitoring to identify trends and develop mitigation actions



Conclusion: Policies Supported

GDC supports policies relating to:

- Tangata whenua issues
- Intent of Policies 2 and 3 (except timeframes)
- Intent of Policies 4 and 5 (provided definitions are appropriate)
- Efficient use and protection from degradation and sustainable development



**Thank you
for this opportunity
to speak to GDC's submission**

