



Tairāwhiti Regional Freshwater Planning Advisory Group – Hui 10

Date: 21 August 2024

Title of report: Water quality and discharges to land and water

- **Feedback to date and indicative TRMP approach/changes**
- **Diffuse discharges – recap and further discussion**

Report no: 1

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Purpose of this report

This paper and FWAG meeting relate to the 'Water quality and discharges to land and water' section of the Tairāwhiti Resource Management Plan (TRMP). This report provides information to the Advisory Group on:

- FWAG feedback on the water quality and discharges to land and water topic to date and indicative TRMP approach/changes
- Further discussion and feedback on diffuse discharges

Outcomes sought

Members of this Advisory Group:

- consider the response to the feedback on each sub-topic (report and Attachment 1 and 2) and confirm if the direction is on the right track.
- consider and discuss different approaches, options, and priorities for managing diffuse discharges to provide guidance for the future plan provisions (and broader approach).

Getting ready for the hui

Please consider the material and questions in this report ahead of the hui as the aim is to work through these at the hui to help guide the approach of the TRMP.

Contents

Summary	3
Questions for the Advisory Group	4
1. Background and context.....	5
2. Feedback and Indicative TRMP Approach	5
2.1 Point Source Discharges	5
2.2 Discharges to Groundwater and Bedrock	7
2.3 Fertilizers and Solid Discharges	8
2.4 Discharges from Hazardous Substances and Contaminated Sites	9
2.5 Unreticulated wastewater treatment, storage and disposal	10
3. Diffuse Discharges.....	11
3.1 Introduction	11
3.2 Diffuse Source Discharge - Tool Box	11

Summary

The 'Water quality and discharges to land and water' section (discharges section) covers a range of discharge activities that may affect freshwater quality and other freshwater values. Due to its broad scope, the discharges section was discussed across three Advisory Group hui:

September 2023: point source discharges and discharges to groundwater and bedrock

October 2023: diffuse discharges, fertilizers and solid discharges

December 2023: hazardous substances, contaminated sites and unreticulated wastewater treatment, storage and disposal.

This is a big topic and the discussions and feedback have covered a lot of ground. The aim of this report and hui is to take stock of where we have got to, reflect on the korero that we have had on these topics, and:

- outline the way forward for the TRMP – the direction of travel – and confirm this with the group so that the preparation of detailed options and drafting can commence
- further discuss diffuse discharges as this is an important, complex issue with many facets and elements.

The management of diffuse discharges (for example sediment, microbiological and nutrients) is a key challenge in Tairāwhiti, as it is in many regions. It is important that the approaches that are adopted in the TRMP (and other non-statutory initiatives) are practical and achievable, while at the same time deliver on Te Mana o te Wai and provide a pathway for improvement for freshwater quality and ecosystem health.

More korero is needed to identify what needs to be done and will work best Tairāwhiti to guide this path forward.

Questions for the Advisory Group

Questions for the Advisory Group to consider

For each of the topics below (we will work through them one at a time):

- ❖ Are there any aspects you would like clarified?
- ❖ Are there any additional issues/points you would like to highlight?
- ❖ Do you support the general approach – or does the TRMP need to be stronger or less regulatory?

Topic Areas

1. Urban Stormwater
2. Wastewater Overflows
3. Tile drainage
4. Bore drilling and managed aquifer recharge
5. Fertilizers and Solid Discharges
6. Agrichemical Use
7. Contaminated Land (discharges)
8. Unreticulated wastewater treatment, storage and disposal

Diffuse Sources

- ❖ What are the key (manageable) diffuse sources?
 - Where are the big wins/priorities?
 - What do we focus on at this time?
 - What are some reasonable targets and timeframes for change – e.g. for stock exclusion – recognising cost and practicality?
- ❖ Of the options:
 - Which options are most likely to be applicable and where?
 - What are some alternatives?
- ❖ What should be the role of Freshwater Farm Plans/Farm Environment Plans?
 - Are they/should they be a key implementation tool that enables a farm by farm approach?
 - How do we ensure compliance?
 - How do we incorporate iwi management plans/iwi values into farm environment planning and other outcomes?

1. Background and context

The 'Water quality and discharges to land and water' section (discharges section) covers a range of discharge activities that may affect freshwater quality and other freshwater values. Due to its broad scope, the discharges section was discussed during three Advisory Group hui.

September 2023: point source discharges and discharges to groundwater and bedrock

October 2023: diffuse discharges, fertilizers and solid discharges

December 2023: hazardous substances, contaminated sites and unreticulated wastewater treatment, storage and disposal.

The aim of this hui is to reflect on the korero that we have had, and:

- Outline the way forward for the TRMP – the direction of travel – and confirm this with the group so that the preparation of detailed options and drafting can commence.
- Further discuss diffuse discharges as this is an important, complex issue with many facets and elements. More korero is needed to better define the path forward.

The discussions and feedback have covered a lot of ground across multiple topics.

Section 2 works through the discharge topics and provides a brief overview of the topic and some of the management issues, and then summarises the general (future) direction for the TRMP, including the likely extent of change (green – low: orange moderate). Further details on each topic and feedback that has been received are provided in Attachment 1.

Section 3 of the report revisits the topic of diffuse discharges, with the aim of exploring and narrowing down the key issues and which management options to progress.

2. Feedback and Indicative TRMP Approach

2.1 Point Source Discharges

Point source discharges are discharges that come from a specific point (or points) – usually a pipe. The TRMP manages a range of point discharges, but three were highlighted as the most significant in terms of potential effects on Tairāwhiti's freshwater environment:

- Urban stormwater, including from industrial and trade premises
- Reticulated wastewater system discharges
- Rural field and tile drainage systems (unpumped/pumped)

Stormwater/Industrial Sites - Recap

The current urban stormwater provisions seek to manage stormwater by promoting low impact design, not compromising freshwater objectives, improving the quality of stormwater discharges where water quality is degraded and requiring industrial and trade activities to treat stormwater and adopt a stormwater management plan.

The rules generally permit smaller and existing stormwater discharges from land, roofs and paved areas and the existing public stormwater network, provided conditions are met. Council is required to obtain a stormwater network consent by 2025 (which Council is currently

preparing).

Stormwater flooding continues to be an issue (including its contribution to wastewater overflows) and water quality is a concern. The management of industrial sites and their discharges and effects continue to be highlighted as an issue.

Future TRMP Direction - Stormwater

- Reflect ki uta ki tai in RPS – more emphasis on the land use that generates stormwater
 - ensure capacity in stormwater network/suitable disposal methods, implement water sensitive design
- Enhance stormwater management in existing urban areas
 - clear guidance and expectations – align to freshwater objectives and targets set in catchment plans
 - simplify/strengthen TRMP rules for stormwater networks and development that discharges to the network
- Industrial sites
 - clarify the rules, guidance and expectations
 - adopt a risk based approach – focus on highest risk activities
 - improve compliance with the rules



Wastewater Overflows - Recap

The current rules for wastewater overflows set a direction that wet weather overflows should be reduced to no more than one every two years. Overflows/discharges in wet weather were permitted until 1 July 2020, subject to conditions requiring monitoring, signage and reporting; and subsequent to this date require a resource consent. Overflows in dry weather require resource consent.

Council was granted a resource consent in 2021 for wastewater overflows for a period of 10 years (dry weather) and 15 years (wet weather) respectively. These consents require Council to substantially reduce the frequency and volume of wet weather overflows – to an average of no more than one every two years (the TRMP target) within 10 years – and to implement a strategy to manage and eliminate (as far as possible) dry weather overflows. Growth and development can make the problem worse.

Wastewater overflow discharges are offensive to, and opposed by, tangata whenua and the community – and a target of no overflows is sought.

Future TRMP direction – wastewater overflows

- Include provisions in RPS to direct new development, and sub-division
 - ensure capacity in wastewater (and stormwater) network before approving new development
 - compliance for development to ensure no cross connections
- Set clear targets and timeframes in TRMP and catchment plans - no avoidable overflows



- Stronger, more directive policy framework, remove permitted activity rule

Tile Drainage - Recap

Tile drainage is used to control the level of the water table for horticulture and similar activities. It can comprise gravity drains or drains that collect water in a sump that is then pumped out. The gravity discharge of water from rural field and tile drainage is permitted under the TRMP subject to conditions, including in relation to flooding, erosion and cumulative contribution to degraded water quality. The discharge of pumped rural field and tile drainage water requires a resource consent.

Issues include the discharge of water containing chemicals, for example nutrients that have been applied to land – which can lead to cumulative effects – and flows exceeding the capacity of the drains they are directed to. In some circumstances, tile drainage can result in the draining of wetlands.

Future TRMP direction – Tile Drainage

- Improve information/knowledge
 - require tile drainage to be mapped in Freshwater Farm Plans (RMA) / Farm Environment Plans (TRMP) or provided as part of rules
- Retain the current rules in most areas – but more stringent rules in catchment plans where:
 - There is a large number of systems
 - The cumulative effects of discharges are having an adverse effect
- Enhance the rules
 - address 'loop-holes' for pumped systems
 - broaden considerations to include drainage of wetlands
- Manage inputs (e.g. fertilizer etc. – through limits and FFPs/FEPs)



2.2 Discharges to Groundwater and Bedrock

2.2.1 Groundwater and Bedrock - Recap

The TRMP includes a range of provisions associated with the drilling of bores – as do all regional plans, including for:

- Drilling of bores and associated discharges of construction fluids – water bores and hydrocarbon – and decommissioning of bores
- Discharges to groundwater

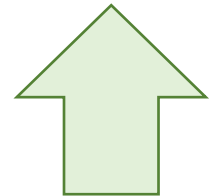
In respect of drilling bores, the TRMP is more stringent than most other regional plans and the provisions are generally working well; however, national guidance on bore drilling and construction is out of date.

There are no specific provisions or rules for managed aquifer recharge (MAR), which has previously been the subject of initial consideration/scoping in Tairāwhiti and a topic of interest. While MAR can result in benefits such as improved groundwater availability and preventing saline intrusion, it can also lead to other issues include water quality in aquifers.

Future TRMP direction – Discharges to Groundwater and Bedrock

Bores

- No major change
- Refine and update existing provisions, including appendices



Managed Aquifer Recharge

- Enhance the policy framework
 - specific requirements and considerations for applications – water quality, cultural, saline intrusion, allocation of water etc
 - retain requirement for resource consent
- Consider RPS provisions providing for a strategic approach – take and discharge



2.3 Fertilizers and Solid Discharges

Fertilizers and Solid Discharges - Recap

This set of provisions relates to material that is applied/discharged to land and which may run off to surface water or infiltrate into groundwater. There are two main types of activities that are controlled:

- The application of fertilizer
- The disposal/application of a range of solid waste/material (rural and other waste)

It is common for regional plans to manage these activities and similar rules are found in most regional plans. New landfills (which are rare) require a resource consent, but there is limited guidance.

Future TRMP direction - Fertilizers and Solid Discharges

Nutrients

- Focus more stringent rules where needed, not everywhere
 - nutrient caps – regional (default)
 - catchment specific limits where needed to meet targets states
- FFPs/FEPS – primary implementation/compliance tool
- Improve compliance for FFPs



Farm dumps/offal pits



- No major change – refinement of provisions
- Improve recording/information – make requirement of FFPs
- Revise/update permitted activity rules – (other regional plans)

New Landfills

- Unlikely to be a major issue – but more specific direction required
- Refine TRMP
 - More specific direction – siting, effects, management
 - Enable bonds to be taken



2.4 Discharges from Hazardous Substances and Contaminated Sites

The rules in this sub-section cover activities associated with the use of chemical and hazardous substances (predominantly agrichemicals) and the management of discharges from contaminated sites.

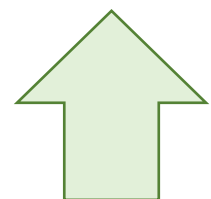
Agrichemicals - Recap

The rules permit agrichemical use, subject to conditions. The unauthorised disposal of hazardous substances is a prohibited activity. Meeting any requirements of EPA approvals or other guidelines/standards is a requirement of the rules. Section C1.5.4 (Discharges to Air) of the TRMP also incorporates requirements relating to the management and application of agrichemicals.

There is potentially widespread use of agrichemicals in some areas, particularly associated with the horticulture industry. Council's monitoring has indicated occasional elevated levels of some agrichemicals in groundwater on the Poverty Bay flats.

Future TRMP direction - Agrichemical use

- No major change - refinement of existing provisions, more visible requirements
- Education, promoting safe use and disposal



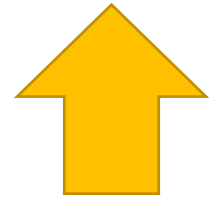
Contaminated Land - Recap

All councils have sites within their jurisdiction that have been contaminated because of past land-use practices. A key issue is knowing where these sites are and whether they are releasing (discharging) contaminants to the environment. The TRMP has a single rule (consent required) governing the discharge of contaminants from contaminated land. Health aspects (land use) are managed through the National Environmental Standard for assessing and managing contaminants in soil for human health (NES-CS). The TRMP also includes schedule G9, which identifies known contaminated sites in the region.

Old landfills have been identified by the group as a legacy issue for Tairāwhiti.

Future TRMP Direction - Contaminated Land

- No major change to TRMP
 - refinement of existing provisions
 - enable remediation and reuse of soils
- Prioritise identification of sites so they can be better managed
 - assess old landfills and prioritise for management/mitigation



2.5 Unreticulated wastewater treatment, storage and disposal

These provisions relate to the storage, treatment and disposal of human wastewater to land or water. The provisions cover a range of treatment system types from very basic to advanced; and different types of wastewater – including sewage, greywater and septage (material removed from a septic tank or similar system).

Given its large rural area and relatively small (reticulated) urban area, Tairāwhiti has a significant proportion of on-site wastewater disposal systems - about one third of Tairāwhiti's households are serviced by an on-site system. The TRMP approach is permissive, with only around 4% of systems holding resource consent.

There is evidence of wastewater in groundwater and surface water in some areas where there is intensive use of systems (cumulative effects), poor ground conditions and high water tables. Additionally, in-fill/subdivision in some areas has the potential to increase the number of on-site wastewater systems (and on smaller sites) and has the potential to increase existing adverse effects.

Maintenance of systems is important but difficult to enforce in practice and can be expensive – particularly for on-site wastewater systems that are located in remote areas.

Future TRMP - On-site wastewater treatment and disposal

- RPS direction
 - identify on-site wastewater constrained areas
 - manage subdivision/development closely in these areas to avoid increasing problems
 - signal when a reticulated network should be considered
- TRMP rules – simplify and strengthen
 - remove overlaps/duplication/very old systems (deep bores)
 - require consents - advanced systems, constrained areas



3. Diffuse Discharges

3.1 Introduction

Diffuse discharges were discussed in Hui 4, and a summary of the feedback to date is provided in Attachment 2. They are defined in the TRMP as 'run-off or leachate from land onto or into land, a waterbody or the sea'. That is, discharges of contaminants in rural runoff that are not captured and discharged at a single point, but which largely run/flow overland to freshwater bodies and the coastal environment (or potentially infiltrate to groundwater).

Specific diffuse discharges are managed in this section of the TRMP:

- Intensively farmed stock activities, commercial vegetable growing and cropping activities (existing and new)
- Discharges from stock access (waterways) or grazing when winter intensive grazing is being undertaken
- Greenhouse nutrient solution to land, feed pads, feedlots

The TRMP provisions provide a permissive approach to the activities above, with few consents sought. However, diffuse discharges are much wider than the activities listed above and include:

- Sediment from a wide range of sources – natural (mass movement/erosion) and in runoff from horticultural and pastoral activities (including intensive winter grazing and break feeding), stock access to rivers and associated stream bank erosion
- Microbiological contaminants (*E. coli*) – runoff from pastoral activities (including intensive winter grazing) and stock access to waterways
- Nutrients – application of nitrogen and phosphate, but can also include stock effluent

Managing sediment is a particularly challenging issue due to Tairāwhiti's natural geology, topography and hydrology – 25% of the North Island's most erodible land is in Tairāwhiti. Additionally, the effects of major storms and past land use activities have resulted in large volumes of sediment being mobilized and a significant proportion of that remains in the freshwater system and will continue to be re-mobilized and discharged during stormwater events irrespective of other inputs.

3.2 Diffuse Source Discharge - Tool Box

Additional management controls may be required for rural discharges to improve freshwater outcomes. A 'toolbox' of management options is available to assist in managing rural discharges, and some of these are outlined in Table 1 below.

Not all options may be needed in Tairāwhiti and some may have practical limitations. However, the purpose of the table is to outline some of the management tools that could be used and discuss their applicability and how they may be combined and applied within the context of the region and its freshwater management issues.

Questions for the Advisory Group

- ❖ What are the key (manageable) diffuse sources?
 - Where are the big wins/priorities?
 - What do we focus on at this time?
 - What are some reasonable targets/timeframes for change – e.g. for stock exclusion – recognising cost and practicality?
- ❖ Of the options below:
 - Which options are most likely to be applicable and where?
 - What are some alternatives?
- What should be the role of Freshwater Farm Plans/Farm Environment Plans?
 - Are they/should they be a key implementation tool that enables a farm-by-farm approach?
 - How do we ensure compliance?
 - How do we incorporate iwi management plans/iwi values into farm environment planning?

Table 1: Toolbox for managing rural diffuse discharges

Management tool	Effects managed	Description	For Discussion	
			Issues	Options
Stock exclusion/setbacks	Water quality, stream bank erosion and associated stream habitat, sediment discharges, microbiological contamination. Protects instream habitat - stream habitat (particularly when combined with riparian planting/management).	<p>Excluding stock from waterways and wetlands through fencing, or natural exclusions.</p> <p>Stops stock accessing riverbanks and direct discharge of effluent to water ways and damage to riverbanks.</p> <p>Providing a setback from a waterway assists in preserving the integrity of the riverbank and providing some space for contaminants in runoff to settle or be filtered out prior to reaching the waterway.</p> <p>This can be enhanced by the provision of riparian planting, which can also assist in filtering, river-bank stability, contributing to in-stream habitat and shading (in small rivers)</p>	<ul style="list-style-type: none"> • Difficult to fence on steep land and mobile rivers • Need to consider exclusion, not just fencing • Fencing/protection can be destroyed by upstream discharges • Cost is significant – beef/sheep + reticulation • Loss of productive land if too far from river • How are setback areas managed – weeds etc. • Others ? 	<ul style="list-style-type: none"> • Retain current approach – intensively farmed stock + national requirements • Expand intensively farmed definition – include lower sloped land – e.g. farming on LUC 1, 2 and 3 or a stocking rate (e.g. stock units/ha)? • Set a target for farms – (e.g. 20 % by XX date) leave it to the FFP to decide where and how – but provide guidance/priorities • Simplify rules – single setback width to reduce complexity and aid compliance? • Others?
Riparian planting	Stream bank erosion and associated sediment discharges, microbiological contamination, stream habitat	Promoting riparian enhancement planting	<ul style="list-style-type: none"> • Enhancement/promoting difficult to require through plan • Need alternative mechanisms <ul style="list-style-type: none"> - support, funding etc - Catchment group projects 	<ul style="list-style-type: none"> • Rules that enable (permit) enhancement/replanting of riparian areas • Rules that discourage and control vegetation removal <p>How can we enable enhancement of riparian areas?</p>
Nutrient management / caps	Nutrient enrichment – nitrates, phosphates	Manage/limit the use of nitrogen and other fertilizers to managing	<ul style="list-style-type: none"> • Nutrients can be an issue – but not everywhere 	<ul style="list-style-type: none"> • Rely on nitrogen cap in NES

Management tool	Effects managed	Description	For Discussion	
			Issues	Options
		potential effects on water quality caused by elevated nutrients	<ul style="list-style-type: none"> Phosphorus usually associated with sediment 	
FFPs/FEFs	Wide range of land management issues and effects	<p>FFPs/FEFs provide a mechanism for identifying key management issues in the context of a farm and the wider catchment and freshwater system.</p> <p>This enables site-specific management of farming activities in a way that responds to the farm circumstances and the wider environment</p>	<ul style="list-style-type: none"> Cost/expertise for preparation – needs to be more than Certification – needs appropriate expertise/experience Implementation and on-going compliance 	<ul style="list-style-type: none"> Enhance requirements for FFPs/FEFs <ul style="list-style-type: none"> Identify additional requirements to be included Set targets – enable a staged approach
Land retirement or land use change	Depends on the issue – primarily sediment in Tairāwhiti, but could also be to manage elevated nutrients or microbiological discharges if necessary	This involves the change in land use to address the identified problem. In Tairāwhiti, this is primarily focused on the most erodible land (for example Land Overlay 3A).	<ul style="list-style-type: none"> Cost – landowner, council, community Currently focused on worst eroding areas – (Overlay 3A) – through the sustainable hill country project 	<ul style="list-style-type: none"> Extend areas for retirement Non-regulatory processes - support

Attachment 1

Summary of feedback and indicative TRMP Approach

Stormwater/Industrial Sites	
What you told us	Indicative changes to the TRMP
<p>New development results in more flow</p> <p>Make sure problems don't increase and existing water quality and flooding improved:</p> <ul style="list-style-type: none"> adopt tools such as water sensitive urban design, integrate development manage land use that contribute to discharges <p>More flooding contributes to other effects (e.g. overflows):</p> <ul style="list-style-type: none"> control impervious area don't build houses and buildings in floodplains/overland flow paths design for climate change <p>Industrial and trade activities need to be better managed to reduce pollution:</p> <ul style="list-style-type: none"> clearer rules/requirements needed ensure compliance with rules 	<p>Provisions in RPS to direct new development, re development and sub-division including:</p> <ul style="list-style-type: none"> improve ki uta ki tai connect to stormwater network where one is available and there is capacity (including climate change) - avoid increasing flooding implement water sensitive design require high contaminant areas (to be defined) to be treated <p>Enhance integrated stormwater management of existing urban areas:</p> <ul style="list-style-type: none"> improve current approach to ICMPs – clear guidance and expectations – align to freshwater objectives and target attribute states set in catchment plans (e.g. Waipaoa and Waimata) identify priorities for stormwater treatment and flood management consider coastal contaminant issues <p>Amend the TRMP rules:</p> <ul style="list-style-type: none"> simplify/strengthen rules for stormwater network revise permitted activity rules <p>Industrial Sites:</p> <ul style="list-style-type: none"> clarify the rules to make them more implementable – based on risk, greater guidance/expectations implement the rules – ensure compliance (can be done now)
Wastewater network overflows	
<p>This is a priority issue for tangata whenua, community and water quality</p> <p>Needs good governance:</p> <ul style="list-style-type: none"> GDC, tangata whenua and community need to work together <p>Stop tinkering, deal with the problem:</p>	<p>Include provisions in RPS to direct new development, and sub-division:</p> <ul style="list-style-type: none"> ensure capacity in wastewater (and stormwater) network before approving new development improve surveillance re development to ensure no cross connections

<ul style="list-style-type: none"> • need to get stormwater out – don't mix • zero overflows should be target <p>Manage growth – don't make the problem worse</p>	<p>Stronger framework in TRMP:</p> <ul style="list-style-type: none"> • continue to drive a decrease overflows • a target of no (avoidable) overflows – set clear targets and timeframes in TRMP • remove permitted activity rule, revise other rules
<p>Tile Drainage</p>	
<p>Recognise benefits - essential for horticulture Build a record of location:</p> <ul style="list-style-type: none"> • better understand effects • map degradation • maintenance needed to reduce flooding <p>Manage inputs (fertilizers) and setbacks from drains:</p> <ul style="list-style-type: none"> • farm environment plan nutrients would enter water by other pathways <p>Clarify rules:</p> <ul style="list-style-type: none"> • consent for pumped can lead to 'work arounds', need more control/criteria 	<p>Improve information – create a database/map:</p> <ul style="list-style-type: none"> • require tile drainage to be mapped on FFPs/FEPs¹ • provision of information to Council as part of rules <p>Retain the current rules in most areas – but more stringent rules in catchment plans where:</p> <ul style="list-style-type: none"> • large number of systems • cumulative effects of discharges <p>Enhance the rules:</p> <ul style="list-style-type: none"> • address 'loop-holes' for pumped systems • broaden considerations to include drainage of wetlands • manage inputs (e.g. fertilizer etc.) – through limits and FFPs/FEPs
<p>Bore drilling and managed aquifer recharge</p>	
<p>What you told us Indicative changes to the TRMP</p>	
<p>Bore drilling generally working well:</p> <ul style="list-style-type: none"> • no need for major changes <p>Managed aquifer recharge is a complex issue:</p> <ul style="list-style-type: none"> • lots of unknowns • need to understand hydrology <p>But potential benefits:</p> <ul style="list-style-type: none"> • more water for use • help prevent saline intrusion <p>Water quality is a key consideration:</p> <ul style="list-style-type: none"> • needs to be good – don't want to pollute aquifer • strong plan provisions needed – ensure assessments are thorough • maintain or improve water quality in aquifer <p>Big picture integrated approach needed:</p> <ul style="list-style-type: none"> • GDC needs to take a lead 	<p>Bore drilling:</p> <ul style="list-style-type: none"> • no major changes proposed • general refinements and simplification of rules • refine/update appendices <p>Managed aquifer recharge:</p> <ul style="list-style-type: none"> • enhance the policy framework • specific requirements and considerations for applications – water quality, cultural, saline intrusion, allocation of water etc. • retain discretionary activity (requires consent) status to enable a broad range of considerations <p>GDC leadership:</p> <ul style="list-style-type: none"> • consider RPS provisions providing for a strategic approach to provide for/guide MAR
<p>Fertilizers and Solid Discharges</p>	

What you told us	Indicative changes to the TRMP
<p>Farming only uses nitrogen – not synthetics:</p> <ul style="list-style-type: none"> • uses much less than horticulture • application is managed spatially within a farm – variable rate • move towards clover – fixes nitrogen • nitrogen not generally a big issue in most areas but phosphorus might be - attaches to sediment <p>Cropping and permanent horticulture:</p> <ul style="list-style-type: none"> • very different • fertiliser use very high for annual crops, farming only a fraction of this • intellectual property issues re fertiliser use, may be reluctance to share/report information <p>FFPs and nutrient management plans:</p> <ul style="list-style-type: none"> • best practice + monitoring • how do we may sure they are effective? • nutrient caps may be appropriate in some circumstances • blanket rules unfair – large variation in fertiliser use • setbacks where overland flow is an issue • council capacity / expertise an issue • what make the biggest difference – input controls or treating discharges (and can this be done) • consider industry working group rules 	<p>Nutrients</p> <p>Focus on key areas and improve management and compliance:</p> <ul style="list-style-type: none"> • set nutrient caps in conjunction with NES-F – consent required above specified level of application • regional limits – but more stringent limits in catchment management plans where necessary • i.e. focus more stringent rules where most needed, and not everywhere • use freshwater farm plans as the primary mechanism for managing on-farm/horticultural activities • specify key requirements for adoption in FFPs/FEPs– eg nutrient limits, setbacks etc • improve Council compliance of FEPs/FFPs [see diffuse discharge discussion] <p>Farm Waste Dumps/offal pits</p> <ul style="list-style-type: none"> • improve recording/information – requirement of FFPs • revise/update permitted activity rules <p>Solid Waste Landfills</p> <p>Unlikely to be a major issue, but the TRMP provisions require updating:</p> <ul style="list-style-type: none"> • move considerations for siting new landfills to RPS (to direct land use considerations) • incorporate specific considerations for landfills/discharges – including use of bonds for remediation
Agrichemical Use	
What you told us	Indicative changes to the TRMP
<p>Horticulture industry generally trained:</p> <ul style="list-style-type: none"> • aware of air discharge requirements • casual users may not be <p>Take a holistic approach – raise awareness, make it easier to comply:</p> <ul style="list-style-type: none"> • reduce waste, raise awareness, information • reduce chemical use • regenerative farming – look for different ways to encourage more sustainable practices • provide for safe disposal of used containers etc – make it easy to do the right thing • national leadership 	<p>Provisions are largely standard – no major changes necessary, but some minor amendments:</p> <ul style="list-style-type: none"> • restructure rules to make the plan easier to use • clearer interface between air discharge and discharge provisions – these requirements are a bit 'hidden' • promote education, safe use and disposal etc.

Contaminated Land (discharges)	
What you told us	Indicative changes to the TRMP
<p>Old landfills are a significant legacy issue:</p> <ul style="list-style-type: none"> • need to identify and manage • conversations with mana whenua – engagement critical • prioritise – hit the biggest problems first <p>Don't transfer the problems elsewhere:</p> <ul style="list-style-type: none"> • circular soil economy – reuse soils where we can • deal with our problem ourselves if we can 	<p>Promote remediation/management of contaminated land:</p> <ul style="list-style-type: none"> • proactive identification of sites and effects – prioritise management • assess old landfills and prioritise for management <p>TRMP:</p> <ul style="list-style-type: none"> • no major change - align with best practice management of contaminated land • provide for beneficial reuse of low-level contaminated soil
Unreticulated wastewater treatment, storage and disposal	
What you told us	Indicative changes to the TRMP
<p>Known disposal issues, including cumulative effects, at Tolaga Bay, Makaraka & Wainui:</p> <ul style="list-style-type: none"> • systems can get overloaded in summer • lead to problems <p>Current system working quite well – septic tank companies contact people, but driven by companies not Council requirements</p> <p>New systems take up a lot of land, not certain that the effluent fields are checked and maintained and are very expensive</p> <p>Septage disposal issues – septage sites are very contentious</p> <p>Independent management vs Council taking over management:</p> <ul style="list-style-type: none"> • don't support council management but need to build a system to improve management/compliance <p>At what point should reticulation be looked at?</p> <ul style="list-style-type: none"> • probably case by case • but some areas may need a managed treatment and disposal system 	<p>Engineering/design:</p> <ul style="list-style-type: none"> • update relevant code of practice (underway) <p>Provisions in the RPS to direct:</p> <ul style="list-style-type: none"> • connection to the public network (where possible) • identify constrained on-site wastewater areas (could signal and identify in regional components of TRMP) • stronger requirements for sub-division in constrained areas <p>TRMP - more stringent (consent) rules:</p> <ul style="list-style-type: none"> • require a higher level of performance and maintenance in constrained areas • require resource consent for more advanced systems bring into a consenting and compliance framework • continue to allow septic tanks in other/remote areas <p>Improve compliance/maintenance:</p> <ul style="list-style-type: none"> • improve record keeping, including location /type of system • warrant of fitness or similar, require records - initially in priority areas

Attachment 2

Diffuse Discharges – Feedback to date

Diffuse discharges and sediment
What you told us
<p>Sediment</p> <ul style="list-style-type: none">• Landscape scale - whole of catchment approach, start at top• Forestry slash causing river and bed erosion, changing hydrology and climate change likely to make it worse• Stabilise land - bring back funded erosion control trees and funded native regeneration – continuous cover of native forestry/alternative species• Wetland restoration is key - improve hydrology, need to target an increase in wetland % across each catchment
<p>Stock Access/Exclusion/E.coli</p> <ul style="list-style-type: none">• Complex – issue - one size does not fit all – no single solution• Fencing on riverbanks gets destroyed by forestry slash• On land >5° erosion means the fences fall into the river – need to focus on exclusion not just fencing• Cost significant - approx. \$ 28-\$33 / metre for fences and need for reticulation doubles the price of fencing – what works for dairy doesn't work for sheep – target cattle first• Stock exclusion on steeper land needs to be supported by riparian planting / land retirement• Catchment/local approach that takes into account local specifics - focus on areas above recreational sites• Manage pace of change – don't make it unaffordable
<p>Setbacks</p> <ul style="list-style-type: none">• Setbacks unlikely to be being observed - no compliance or monitoring, horticulture setbacks aren't being used - people aren't even aware of them• Need to implement + monitor what's in the plan before adding new rules• Use smart technology - (e.g. sensor to check continuity of the top wire), drones / satellites/ LIDAR as part of monitoring system
<p>Nutrient Management</p> <ul style="list-style-type: none">• Farming only uses nitrogen – not synthetics, application is managed spatially within a farm – variable rate application. Move towards clover – fixes nitrogen.• Farming uses much less than horticulture, nitrogen not generally a big issue but phosphorus might be - attaches to sediment• Cropping and permanent horticulture are very different• Fertiliser use very high for annual crops, farming only a fraction of this• Intellectual property issues re reporting fertiliser use• Council capacity / expertise an issue
<p>Freshwater Farm Plans</p> <ul style="list-style-type: none">• Need funding and support, range of parties involved• MPI (Private landowners)?• Te Puni Kōkiri (Māori land)?• Beef & Land + Federated Farmers + AgFirst – involved in some areas, but no FEPs for orchards yet• Need to strive for best practice – good tool, raises awareness etc. but only as good as collective buy-in. Need a shift in mindset – move beyond the status quo• Have Tairāwhiti specific approach – work with industry groups, mana whenua – incorporate iwi management plans (below)

Iwi Management Plans

- Opportunity to collate and communicate knowledge and experience – help inform FEPs/FFPs
- Whakapapa – whakapapa Taiao – cultural indicators
- Wahi tapu, geographical distribution, where we have historically culturally practiced
- Passion, experience, recognition of use, history and values
- Need to be accessible, monitored and reported on
- Requires resources to prepare and monitor