



# **Review of Greater Wellington Public Engagement and Consultation for the Natural Resources Regional Plan 2009 – 2013**

For more information, contact Greater Wellington:



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## 1. Summary

This report reviews the results of the past three years of public engagement supporting the preparation of Greater Wellington Regional Council's (GWRC) draft regional plan for natural resource management. The engagement and consultation process is on-going and the Council aims to release a draft regional plan in mid 2014.

Engagement events were held in 2010 with the public and interested parties. These were continued in 2011 and into 2012. From 2012 and continuing into 2013 a series of meetings and workshops were held specifically with stakeholders.

The 2010 workshops identified that water (out of all the natural resources being considered – fresh water, coastal areas, soils and air) was the most critical resource of concern to participants. They felt that the management of fresh water in urban and rural contexts, was the most critical issue needing to be addressed in the regional planning review.

In 2011, GWRC was encouraged by the public to take an integrated catchment approach to addressing water management issues. The possible objectives suggested were generally supported by the public attending these meetings.

In 2012, meetings with stakeholders mainly focussed on the uses and management of the coastal marine area, hazard management, the use and management of the beds of lakes and rivers, rural land uses that could impact on water quality, water allocation and urban land uses that could impact on water quality (stormwater). Of these, the policies and methods related to rural landuse, water allocation and stormwater management gave the most divergent views among different sectors taking part in the discussions. . The policies relating to stormwater planning were supported in general, but it was recognised that they potentially had substantial costs implications for some communities.

In 2013 further meetings have been held covering specific matters covering significant sites, wetland management, historic heritage and the management of regionally significant infrastructure.

## 2. Introduction

Greater Wellington Regional Council formally began the review of its regional plans in October 2009 following the establishment of Te Upoko Taiao – Natural Resource Management Committee (Te Upoko Taiao). The review of natural resource management carried out by GWRC was required under the Resource Management Act as the existing five regional plans had been in operation for ten (10) or more years. The reviews of the regional plans were to take into account the aspirations of the general public, key stakeholders, mana whenua iwi and territorial authorities.

The results of the engagement in this report have been divided into the years that the engagement has been held – 2010, 2011, 2012 and 2013. Over that time the possible policy options have evolved in response to the feedback from the public and stakeholders, new information, the developing policy framework, and the guidance of Te Upoko Taiao. Therefore the nature of the feedback has also evolved. This report provides material selected from the records of each of the events in each of those years, to provide a coherent description of feedback from the engaged communities.

### **3. Engagement and Consultation Purpose**

“The purpose of the community engagement was to provide an opportunity for ratepayers and stakeholders in the Wellington region to contribute to the development of policies for natural resource management and the development of a proposed regional plan”<sup>1</sup>. For this purpose, events were held with various communities throughout the Wellington Region. See Table 1.

In 2010 the intention was to create a snapshot of peoples’ evaluation of the state of the Region’s natural resources. These contributed towards identifying the issues to be addressed in the plan and the plan’s objectives.

In 2011 people in the region were consulted about the high level policies and priorities for the plan.

In 2012 people in the region were consulted about possible policies in specific sections of the plan.

### **4. Engagement and Consultation Methods**

In 2010 the engagement strategy had six parts:

1. Sixteen workshops open to all members of the general public throughout the region. These were attended by about 500 people. Two more workshops were held with pupils at Owhiro School, attended by about 40 pupils.
2. An online survey available to all members of the public. This was used by over 800 people.
3. Workshops with five iwi authorities in the region.
4. Workshops with three Territorial Authorities in the region.
5. Newsletters with regional communities associated with the workshops and survey.
6. Communications within GWRC to encourage organisational participation in the review of natural resources.

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<sup>1</sup> From the Engagement and Communications Plan [http://www.gw.govt.nz/assets/council-reports/Report\\_PDFs/2010\\_183\\_1\\_Report.pdf](http://www.gw.govt.nz/assets/council-reports/Report_PDFs/2010_183_1_Report.pdf).

**Table 1. Schedule of consultation events 2010-2012**

Catchment	Iwi partners	Number of events		
		2010	2011	2012
Eastern Wairarapa with waterways linked to the Pacific Coast	Kahangunu ki Wairarapa and Rangitāne o Wairarapa	1	-	-
Ruamāhanga Catchment with waterways linked to Wairarapa Moana and Lake Onoke	Kahangunu ki Wairarapa and Rangitāne o Wairarapa	3	3	3
Northern Wellington Harbour and Southern Wellington Harbour with waterways linked to Wellington Harbour and Cook Strait respectively	Port Nicholson Block Settlement Trust and Ngāti Toa Rangātira	9	2	2
Porirua Harbour and its associated waterways	Ngāti Toa Rangātira	1	1	1
Western Coast and waterways linked to it along the Kāpiti coastline	Ngā Hapū o Ōtaki and Ati Awa ki Whakarongotai	3	2	2

In 2011, the engagement strategy had four parts:

1. Workshops with the general public in six regional catchments: western coastal, Porirua Harbour, northern Wellington Harbour, southern Wellington Harbour, Ruamāhanga River, and eastern coastal catchments. These events were attended by about 150 people in total.
2. An online survey used by about 260 people.
3. Hui were held with three iwi groups that have mana whenua in the region, these involved 35 people.
4. Two workshops were held with stakeholder organisations in Wellington and Masterton involving about 60 people in total.

In 2012, a series of seven open public meetings were held. These meetings were attended by about 120 people in total. For each of the seven topics in the regional plan, a series of 2-3 workshops were held with stakeholders, giving a

total 20 focussed workshops. The stakeholders invited, were organisations that had a previously history of working with the Council on regional planning documents and consent applications.

## 5. Results for 2010 about possible topics for the regional plan

Water quality was the most important topic in the region. The issues that people had about this topic largely involved possible risks to human health and loss of aquatic life. The main threats to water quality were considered to be from: town sewage discharges, stormwater systems, erosion, chemical contamination, livestock access, farm dairy effluent, flood management and low river flows. People wanted remaining wetlands in the region to be protected. The potential harvesting and use of water for irrigation was widely supported.

Biodiversity was the most important topic after water quality, for the Wellington region. The issue that most concerned people was the apparent decline in the areas of native bush and the effects that this could have on wider biodiversity values across the region (for an example Figure 1).

**Figure 1. Natural resource priorities identified by two of the pupils at Owhiro School.**



Biosecurity was another widely recognised natural resource topic. Many people wanted greater coordination of animal pest control across the region and a reduction in plant pest escapes from private properties.

Soil management was identified by many people as an important topic to be considered in the regional plan. In some cases it was linked to maintaining water quality. The main issue related to soil management was the need to reduce erosion and protect highly fertile soils.

Coastline management was an important topic for many people. People wanted the coastline protected for fishing, swimming and recreation. They were concerned about threats from vehicle access to beaches and the increase in coastal subdivisions.

Air quality was a topic of concern to some people across the Wellington region. People thought that the widespread use of wood burning stoves was an issue as well as vehicle emissions.

People wanted riparian areas protected and planted for biodiversity and flood control.

Rubbish, waste and littering was an important topic that people wanted addressed. Their main issue was need for encouraging recycling.

Stormwater was an important topic for people. People wanted sewage to be kept out of stormwater systems and natural waterways. They felt that stormwater discharges were contaminating streams and they wanted this reduced. People were concerned that not enough was being done to reduce the volume of stormwater being collected.

People wanted distinctive landscape features protected in the region. One of the main issues here was the need to protect open space areas for recreation.

Mahinga kai and public gardens were topics that people felt should be included in the regional plan. They provided an opportunity to enhance the identity and self-sufficiency of tangata whenua.

## **6. Results for 2011 about the possible high level policies within the draft regional plan**

### **6.1 General**

For the general public in 2011, freshwater, biodiversity and the coastal marine area were focussed upon. Iwi groups generated most of their ideas about freshwater, relationships between tangata whenua and land and water, and tangata whenua and sites of significance. Stakeholders were again interested in policies on freshwater, sewerage and stormwater systems. See Figure 2 for more detail.

### **6.2 Integrated catchment management**

People supported an objective for the Regional Council to manage natural resources in an integrated way. The “super catchment” scale was appropriate for this.

People wanted clear policies bringing all the Regional Council activities into alignment with integrated catchment management.

People were not able to address policies relating to Whaitua as these had not been formed at the time of the 2011 Engagement and Consultation meetings.

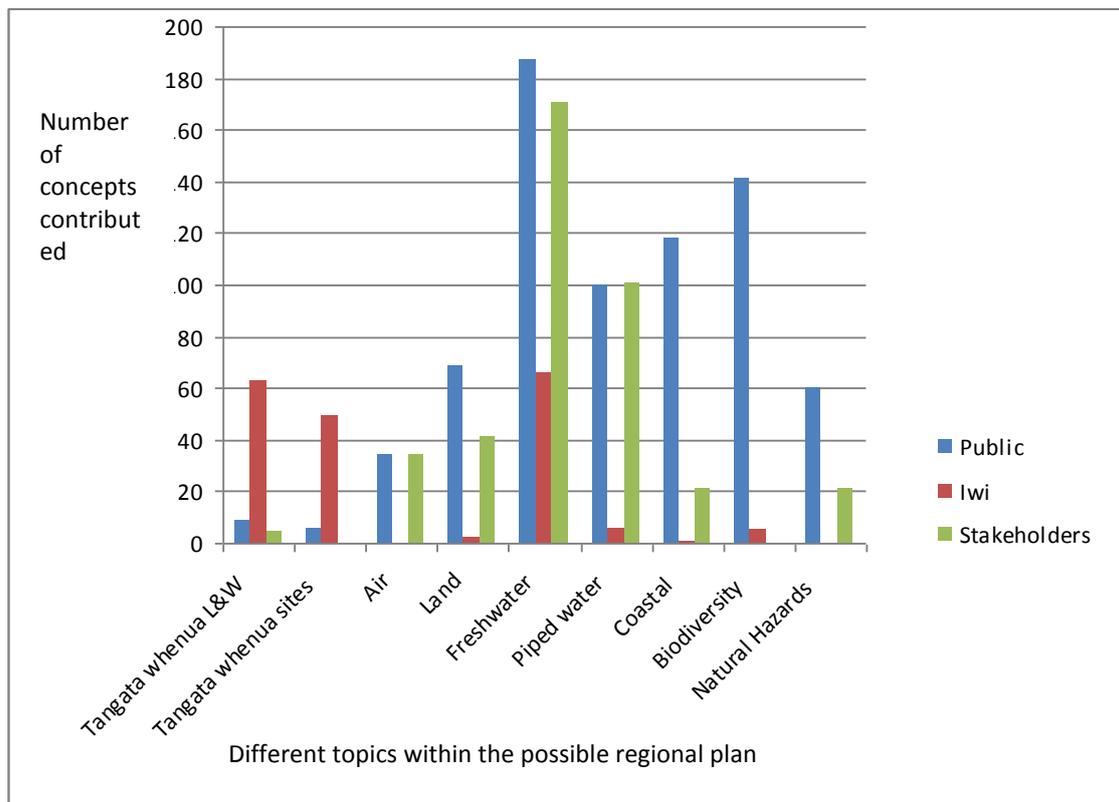
People supported the policies for beneficial activities and uses.

Some people wanted more policy constraints in place on the management of drainage infrastructure.

Some people did not support the level of “existing” flood protection as being wholly beneficial.

Some people wanted policies to protect sensitive receiving environments (lakes and harbours) by constraining landuse activities throughout those catchments.

**Figure 2: In 2011, the number of concepts contributed towards different topics within the regional plan**



### 6.3 Beneficial use and development

People wanted specific economic and social objectives that made transparent how these were being balanced with the regional plan’s environmental objectives.

### 6.4 Natural hazards

There was support for the all the objectives proposed for managing natural hazard risk and widespread support for the possible policies.

In 2011, people considered that GWRC needed to be starting planning straight away for sea level rise and climate change.

People were supportive of policies to control development in high hazard areas. They also were supportive of policies to use soft engineering.

People were supportive of policies to limit adverse environmental effects of hazard mitigation measures.

## **6.5 Tangata whenua values**

These objectives were supported by people attending the iwi workshops and the stakeholder workshops. People suggested that the partnership between the Regional Council and iwi was worthy of being given an objective on its own.

There was support for the range of possible policies. People preferred particularly the management of “fresh and coastal water systems” as a whole, rather than a narrow focus upon specific sites. There was support for the proposed policies addressing mauri, cumulative effects and kaitiakitanga.

## **6.6 Indigenous biodiversity**

People supported objectives to protect terrestrial, marine and water habitats, including terrestrial biodiversity corridors.

People wanted an objective addressing weed and animal pests.

There was some support for an objective to enable people to harvest indigenous material in specific circumstances.

There was support for the possible biodiversity policies, and in addition people wanted a policy to encourage riparian planting and for developing regional corridors for biodiversity.

There was general support for the mitigation hierarchy.

The greatest area of concern about biodiversity outcomes was their integration and delivery outcomes across terrestrial, freshwater and marine environments. This was expected to require involvement with the the TAs to ensure that they were doing their bit well, and that there were no gaps.

There was support for the issues and goals presented, and no feedback about changing them by participants. Many local concerns were discussed: too much water taken from the Hutt river; cows shouldn't be in streams; the management of the Parangarahu wetlands; support for GW pest and weed control activities; and support for GW care-groups.

People supported the biodiversity objectives. In addition, people suggested an objective addressing the protection and planting of riparian strips along waterways.

## **6.7 Ecosystem health and mahinga kai**

There was general support for this objective. Each catchment was felt to have specific needs that would be met by this objective. Tangata whenua would like the affected community to be highlighted in the objective.

## **6.8 Low energy coastal and freshwater environments**

People generally supported the objectives and policies.

## **6.9 Public access**

People supported these objectives to increase public walking access but limit vehicle access.

People generally supported the policies.

## **6.10 Natural character**

Tentative support for the objectives and policies.

## **6.11 Outstanding natural features and special amenity landscapes**

Generalised support for the direction of these objectives.

## **6.12 Air**

In 2011 generally, people did not think there are air quality problems in Wellington because of the winds. They did acknowledge that there could be localised areas of pollution - such as near industries.

Wood fire smoke affecting local communities was acknowledged, but people thought that addressing the problem could be difficult.

Motor vehicle emissions were identified as an issue for Wellington people, more so than anywhere else. People did note that the regional council does not control motor vehicle emissions, though they were not sure who did. There was concern over the effects of new roads and emissions from motor vehicles.

People supported objectives addressing the human health consequences of air pollution. They were more interested in reducing coal fires than wood fires.

## **6.13 Coastal marine area**

In 2011 people wanted vehicles off the region's beaches. They wanted GWRC to work more closely with district councils on enforcement and with the police.

People wanted more access to coast for disabled people.

When vehicle access was required e.g. white baiting in Waikanae Estuary, it was suggested that they have designated access points and tracks, so vehicles wouldn't be driving on dunes and sensitive environs.

People supported the objectives for the CMA with a priority on protecting and restoring habitats in the coastal marine area. They supported policies to protect shellfish beds in the coastal marine area.

## **6.14 Discharges to land**

People supported policies intended to reduce the effects of discharges to land, especially from agricultural material.

There was generalised support for policies directing the discharge of collected animal effluent.

There were limited responses to policies about cleanfills and landfills. The responses received were supportive of policies to control these activities.

People supported policies for the protection of drinking water.

People supported policies that constrained vegetation clearance and earthworks.

### **6.15 Historic heritage**

Little comment about objectives and policies addressing historic heritage was made.

### **6.16 Soils**

At the 2011 consultation events there was general acceptance by participants that soil erosion was an issue for the eastern Wairarapa hill country. Most people said that the work already being done by Greater Wellington had been worthwhile and should be continued.

People had less knowledge of the soil health problems that appeared to be becoming evident on the Kapiti Coast and Wairarapa plains from land use activities such as dairying and vegetable growing.

People supported the objectives on soils. They wanted an objective that encouraged the industries to work with the Regional Council to have landowners implement best management practices.

People wanted a specific objective addressing hazardous wastes and leachate from municipal landfills.

### **6.17 Beds of lakes and rivers**

There was general support in 2011 for these objectives on the beds of lakes and rivers and people supported the protection and planting of riparian margins.

Some people supported constructions to enhance fish passage for indigenous species.

People supported policies to manage gravel extraction to realise its benefits but limit the negative effects. People expected the ecological impacts of flood control measures to be evaluated as part of the plan review.

People supported policies intended to reduce flooding risks.

A few people wanted policies to control pest plants getting into rivers and lakes.

People were not able to consider off-setting. People wanted the problems created by flood control activities to be addressed in the regional plan but did not suggest any policies for this.

There was no particular support for protecting wetlands or avoiding reclamation and drainage.

### **6.18 Rural landuse and water quality**

In 2011 people felt that more control was needed of sediment runoff during forestry logging operations. They suggested that the public should subsidise farmers to fence off waterways and de-stock to reduce pollution runoff. People considered that the Regional Council needed greater powers to control unsuitable subdivisions by TA's. There was zero tolerance of stock access to waterways.

There is a large concern regarding ongoing weed control for fenced off waterways which people feel need to be addressed before it could become a problem (i.e. plan how it will be dealt with at the same time as planning the requirements for fencing-off).

People supported a catchment approach to manage the cumulative effects of land use, and they supported the objectives addressing discharges to land.

Some people suggested an objective to limit landuse options in high-value catchments. They wanted objectives that addressed livestock exclusion.

There was a little concern about livestock grazing intensities, but nothing specific to dairying.

Greater clarity was wanted about adopting standards associated with community values.

People suggested a combined objective integrating water quality and quantity. They supported policies to protect the habitat of fresh water creatures.

People wanted policies to avoid the disposal of toxic and harmful substances into waterways.

People supported policies to avoid the direct discharges of possible contaminants into waterways.

People did not consider policies for water allocation priorities, discharges to land and synchronised expiry dates for consents.

Some people wanted policies that constrained nutrient management on farms.

### **6.19 Urban landuse and water quality**

In 2011, aging infrastructure was considered to be contributing to the stormwater problems around the region.

Run-off from roads was thought by some people to be causing degradation of water quality and they wanted it to be considered as part of the regional plan review.

There was general support for land management practices that could control stormwater at source.

People wanted the objectives to have clearer targets for water quality improvement.

People wanted the Regional Council to have objectives covering the inputs into stormwater as well as the effects. This particularly related to sediment and silt. They supported the possible policies addressing sediment discharges.

People wanted the plan to have a specific objective addressing the removal of sewage contamination of urban stormwater.

People wanted a policy reducing the proportion of hard surfaces in stormwater catchments and devices for rainfall interception.

People supported policies that minimised the generation of stormwater and avoided the use of streams to treat contaminated material or stormwater. They wanted integrated catchment plans that included stormwater networks as well as natural streams.

People wanted policies to support the Porirua Harbour Strategy.

## **6.20 Water allocation**

People in 2011 considered that there was a need to make water available in a fair and equitable way and they wanted to ensure natural and recreational values of fresh water were protected

People wanted objectives that protected the habitat value of seasonally minimal water flows. They supported objectives to increase water use efficiency, in both rural and urban areas.

People supported policies that took account of all the different uses for water and that would avoid over-allocation and they supported more monitoring of water takes by GWRC.

People wanted policies that enabled harvesting of water above the median flows in rivers. In urban areas they wanted policies to encourage rain water collection and metering of supplied drinking water.

There was no response from people about policies that might guide the provision of water takes for existing users.

People supported policies to encourage the more efficient use of water.

## **6.21 Wetlands**

People attending groups across the region in 2011, were concerned about the loss of wetlands and the services that they provided. They wanted the loss of wetlands to be “stopped”. They also wanted assistance provided to land owners so that they could restore wetlands.

## **7. Results for 2012 – 2013 about the possible policies and methods to be included in the draft regional plan**

### **7.1 Air**

Meetings were held in 2012 with Territorial Authorities in the region. They provided general support in principle for the suggested provisions.

Stakeholders with Centre Port wanted to ensure that the regional plan protected their operations despite the extra dust generated, the use of specialist vehicles, the handling of bulk material, and their use of fumigants.

### **7.2 Biodiversity**

In 2012-2013, biodiversity was included in the workshops examining policies and rules on the CMA.

### **7.3 Coastal Marine Area**

In 2012-2013 there was support amongst stakeholders for taking a precautionary approach towards open ocean natural and physical processes. People wanted adaptive policy processes put in place so that habitats could be protected as they developed and expanded into new areas.

People wanted objective limits to be set for ocean water quality. They wanted greater clarity about the sources of risks to water quality around the coast and the size of risks involved. They wanted coastal water quality to be linked to catchment management.

Stakeholders felt that the policies and rules affecting aquaculture needed to account for customary practices.

Stakeholders wanted to ensure that dredging permitted under specific provisions over-rode anything in the general provisions and standards. They wanted to ensure that maintenance dredging inside the Commercial Port Area was a permitted activity, as was refuelling of ships. Stakeholders wanted to be able to dredge navigation lanes in Wellington Harbour. They wanted deposition from maintenance dredging to be a permitted activity. Stakeholders considered there to be a lack of clarity around dredging in Porirua Harbour.

Stakeholders asked for policies to restrict public access in the Commercial Port Area and protect port operations. They wanted the port to be allowed to make noise in-keeping with the scale of its operations.

Some stakeholders wanted the regional plan to ensure that Centre Port engaged with iwi and community groups before they sought consents for exceptional activities.

Stakeholders wanted the deposition policies to make an allowance for natural deposition. They wanted policies to prohibit deposition in marine reserves, and manage deposition around stormwater discharges. They were concerned about a lack of clarity regarding the hierarchy of rules relating to dredging.

The stakeholders wanted beach grooming to be restricted to only those areas used for public recreation and avoiding significant sites. Beach grooming needed to be restricted to times outside shell fish spawning. People wanted recognition in the plan that beach grooming that involved the removal of seaweed could affect beach ecology. Beach recontouring provisions needed to account for artificial as well as natural beaches. They wanted areas providing natural habitat to be protected from beach recontouring.

The stakeholders wanted reclamation to be available as a way of adapting to sea-level rise from climate change. They wanted reclamation to be avoided in areas with high ecological functions e.g. estuaries.

Some stakeholders wanted special provisions to maintain and repair sea walls.

There was general support for limiting vehicle access to the foreshore. However, some of the stakeholders wanted the regional plan to allow restrictions on vehicle access to beaches to be lifted for the following:

- Emergency vehicles
- Access and egress only
- Launching boats at recognised launching sites
- Access to customary fishing areas
- Works at stormwater outlets and stream mouths

Some stakeholders wanted to ensure that bird nesting areas, shellfish areas and sand dunes were protected from vehicles.

There was wide ranging support for policies enabling the maintenance of stormwater systems in the CMA. Stakeholders wanted stormwater outflows near swimming areas to have improved water quality and increased monitoring. They wanted to ensure that contaminants, both visible and invisible, were all accounted for, especially near marine reserves.

There was support for rules making any disturbance in significant areas a non-complying activity and disturbance outside significant areas a discretionary activity. The rules needed accessible maps and some leeweight for maintaining significant areas, e.g. to replace a pile.

The stakeholders wanted to allow disturbance of the foreshore if that was going to assist with flood control. Other wanted river mouth cutting if that would assist with eel passage and harvesting by iwi. People wanted to ensure that

there could be temporary disturbance for laying cables or other similar works. Some stakeholders wanted disturbance provisions to allow for the removal of pest species. Some stakeholders wanted to ensure that wetlands in the mouths of waterways would be protected.

Stakeholders supported policies to enable boat launching from the beach, but they wanted to protect coastal habitats, significant areas and Ngawi.

Stakeholders wanted drilling for oil and mining to be non-complying activities.

Stakeholders wanted more protection of coastal sites for biodiversity, they felt that Porirua Harbour was not adequately described in the schedules. Some stakeholders did not want “offsetting” to be a management option for biodiversity.

Stakeholders wanted estuary values to be maintained, to be restored, and to be enhanced.

Stakeholders wanted more flexibility for recreation including broadening the types of racing allowed on Castlepoint or Paraparaumu beach.

When it came to the introduction of exotic plants there was general support for the proposed rules. Some stakeholders wanted exotic plants defined at a regional scale to allow for introducing new habitats such as artificial reefs and sunken ships. They did not consistently support rules that allowed the further introduction of existing introduced plant species.

Some stakeholders wanted an extra provision included in the regional plan to ensure that people with consented activities in the CMA were responsible for removing any potential litter or rubbish associated with their activities.

Stakeholders were concerned about what constituted significant sites. They wanted the plan to explain the different sets of criteria used to define each type of significance, from biodiversity to cultural and geological.

None of the stakeholders particularly addressed policies affecting:

- Disturbance
- Efficient use
- Hazardous substances
- Beach renourishment

The stakeholders attending the Coastal Marine policy workshops felt that the list of invited stakeholders should have been widened to include more recreational and science organisations. They wanted more information to be presented in maps with sea level rise, spawning areas, specialist areas (eg the airport flight paths) and significant sites. They wanted information describing beach processes, fish breeding, port activities and regional marine ecology.

#### **7.4 Discharge to land**

Discussions have been held through 2012 and 2013 with farmer groups to develop these provisions

#### **7.5 Hazards**

During the stakeholder workshops in 2012-2013, participants recognised that climate change and sea-level rise needed to be addressed. The timing and severity of effects was acknowledged to be uncertain and an adaptive approach to policies in the regional plan was encouraged. The stakeholders generally liked the suite of provisions being proposed for their consideration and the holistic approach being taken to address natural hazards. They liked the integration of marine and terrestrial hazard management approaches.

The stakeholders supported policies to address sea-level rise by constraining development and new subdivisions in high hazard areas. The stakeholders preferred that existing infrastructure could remain in-place until changes had the agreement of councillors and communities.

Taking a risk management approach was described by the stakeholders as a positive step. They had some concerns that a risk based approach might fit well with one-off events like tsunamis, but it might not fit with insidious risks like sea level rise, that were constant and incremental. They wanted the risk assessments to take into account the types and purposes of the structures likely to be affected.

There was widespread support amongst stakeholders for the establishment of a high hazard management area along the coast and along waterways with flood risk. Stakeholders considered that the area should have different sections according to the types and levels of risks being managed and with different trigger points for initiating action. A hazard management strategy was wanted to support the establishment of a regional hazard management area. The stakeholders supported the regional plan providing TAs with guidelines for establishing a hazard management area, preferably developed from spatial planning. Spatial planning was considered to include asset management plans and plans for urban growth. They wanted the hazard management area to account for changes in future risk patterns and regional development. The stakeholders would like “green fields” development in high hazard areas to be prohibited, but “brown field” developments to be discretionary.

Stakeholders considered that a hazard strategic plan would need to protect existing infra-structure in the hazard management area in the short term, but in the long term encourage a retreat to reduce potential risks.

The development of a hazard management area was expected to require comprehensive consultation with the involved communities and the affected individuals. Stakeholders considered that the ability of the regional plan to guide TAs in a managed retreat in high hazard-risk areas was a helpful policy initiative.

The stakeholders were concerned that any development of a hazard management area could be held up by local authority politics. They asked for greater detail to be included in the policy, particularly about appropriate and inappropriate activities. It would provide flexibility to be able to adjust the area required.

There was general support amongst stakeholders for provisions that would limit the effects of “slope modification ... earth works and vegetation removal”.

The stakeholders supported the collaborative approach being taken in the development of the proposed regional plan. They wanted that continued so that people could share their knowledge about: managing natural hazards, the levels of associated risks, options for managing them and the benefits from taking pre-emptive action.

They liked the emphasis on having an evidential basis for strategically managing the hazards created by sea level rise. Where possible, it was considered that the hazard management area should follow TA boundaries and align with TA protection areas. They felt that GWRC needed to establish clear protocols for working with TAs and landowners so that there would be “joined-up” implementation of the strategy. The stakeholders wanted any strategy being developed to provide options for communities and assist them to decide between protection and retiring.

Stakeholders wanted a flexible approach towards addressing hazard mitigation included in the regional plan. Overall they considered that the regional plan should encourage the use of natural and soft engineering systems in response to the natural processes that created the hazards. Suitable amelioration included buffer strips of sand dunes, wetlands and vegetation. In some situations hard engineering protect from hazards was still thought to be the most practical option and they wanted that allowed for in the regional plan. These might be particularly important for protecting community assets.

Stakeholders wanted mitigation measures to transparently address māori values including mauri. There was concern that the concepts of “management” and “mitigation” might be a little confused in the policies. It was unclear to them how the residual risks remaining after management strategies had been put in place, were to be addressed.

The stakeholders expressed concerns about there being an insufficient level of consultation with the general public and affected communities on the hazard management areas. They were concerned that this could lead to ineffective policies or it might just alienate people. Stakeholders felt that their suggestions about spatial planning might not happen and therefore the policies would lack an integrated and committed response from local government. There were concerns that some communities were not facing up to their responsibilities and instead were sheltering behind works for infrastructure protection. These people needed to be exposed to more information about the size of the threats posed by the natural hazards in their areas. The stakeholders wanted more

local involvement in the decision making related to hazard management in their areas.

There was some concern from stakeholders about an apparent lack in river flood protection. They considered that flood protection activities needed to be given a regional priority alongside meeting the expectations of local communities. Some people felt that GWRC flood protection and stream management by the TAs should both be “permitted activities” in the regional plan.

Some stakeholders wanted policies that would address sea water infiltration into underground aquifers. They wanted the regional plan to protect heritage areas as much as possible from the risks of natural hazards.

The stakeholders felt that implementing the possible regional plan provisions was going to require more information about:

- The economic impact of establishing hazard management areas
- Heritage sites in relation to threats from natural hazards
- Potential risks to the landscape and natural environment from natural hazards
- Geotechnical information about natural hazards

Other stakeholders that the participants wished to have involved in future stakeholder workshops were:

- People involved in infrastructure design
- Insurance companies
- Rate payer associations
- Ministry for the Environment
- Regional emergency people and linked agencies, eg NZ police
- Knowledge organisations, eg GNS Science
- National infrastructure group at Treasury
- Department of Internal Affairs, local government section
- Valuation NZ

## **7.6 Soils**

Discussions have been held throughout 2012 and 2013 with TAs, forestry companies and landowners to develop these provisions

## 7.7 Historic Heritage

Boat shed owners at workshops in 2012-2013 supported their buildings being scheduled in the regional plan as historic heritage. They generally believed that this would give them greater security of tenure. The owners said that it would enable them to work on retaining their character and increasing their contribution to the harbour-scape.

The owners felt that the historic purpose of the sheds had always been to provide for boating and they wanted that to remain central in any planning provisions. The owners felt that the possible policies would support the current affection and identification that local communities had towards the boat sheds. The boat owners agreed that some things were incompatible with the boat shed culture. These were:

- Flamboyant buildings that had lost the kiwi-batch look about them.
- Multi-storey buildings.
- Buildings that could no longer function practically as a boat shed.

The owners considered that the regional plan should ensure that owners kept a standard of repairs and maintenance about their buildings. They did not feel that people should be allowed to let their buildings become dilapidated. The boat owners thought that alterations to their buildings would be Ok as long as they improved their usefulness for boating purposes. They wanted people to be able to rebuild on vacant lots and where buildings had been demolished.

Boat owners said that they often found obtaining insurance difficult and they hoped that the regional plan changes would make this easier. Some owners were concerned that the changes in the historical heritage status might result in increased public access to their buildings and jetties. Never-the-less, they supported having signs up to raise peoples' awareness about the historic value of these precincts.

The boat shed owners hoped that paths, benches, etc. associated with the buildings were included in their historic heritage status. The owners were glad that they could use a range of colours and materials when they were repairing their buildings. They did not want shed owners to be allowed to erect fences, barricades or use barbed wire.

The owners were still concerned that if a building suffered irreversible damage including from a tsunami or hurricane, that they might not be allowed to rebuild.

Boatshed owners wanted GWRC to ensure that if owners removed jetties that they also removed the jetty piles so that they didn't create navigational hazards.

The issue of boatshed owners allowing people to stay overnight in their buildings was very contentious. Most people wanted the regional plan to provide for a limited opportunity for some overnight stays; although a few considered that was not required. As a group, the owners did not want the

sheds to be used for residential dwellings, long term accommodation or rented out as holiday units. They did believe that people should be able to stay in them overnight occasionally. The boat shed owners did not consider that any problems were being created by occasional overnight stays. They thought that they increased the level of security around the buildings. Without overnight stays dogs could become an issue and threaten the wildlife. The owners thought that any restrictions would be impractical to enforce, create high administration costs and cause a rate payer revolt.

One recognised problem for staying in boat sheds was the general lack of sewerage connections. The shed owners wanted GWRC to assist them develop practical options to address this.

The boatshed owners wanted the regional plan to provide for the establishment of local committees that would work in with consenting staff to monitor levels of compliance and encourage adherence to the rules. They thought that one way to do this would be for every boat shed owner to have a log book where all their overnight stays had to be recorded. Anyone going over a certain number would be visited with GWRC staff.

Some boat shed owners considered that GWRC staff should provide guidelines for new and existing boat shed owners, to encourage a greater awareness of their responsibilities.

Stakeholders in Lambton Harbour wanted the area to be managed through change processes rather than protected from it. They wanted to be able to reuse the old buildings, keeping the waterfront vibrant, and creating opportunities for adaptive re-use. The stakeholders consider the provisions that they discussed to be consistent with the regional policy statement. However, they were concerned about an apparent lack of consideration in the possible regional plan for regionally and nationally significant infra-structure and insufficient accounting for practical and economic consequences. They would like greater flexibility for making functional improvements such as earthquake strengthening. The stakeholders felt that the regional plan would be improved by greater recognition that the Lambton Harbour is a functioning port.

## **7.8 Beds of lakes and rivers**

In 2012, stakeholders from Territorial Authorities, Federated Farmers, Waterway Care Groups, Environmental NGOs and GWRC Flood Protection met to consider possible provisions in the draft regional plan.

People wanted policies and rules about structures and piping of streams that would still provide communities with opportunities to grow, improve human safety and visually enhance areas.

In addition, stakeholders wanted rules that would ensure that such development protected ecological functions in streams and maintained existing flow patterns. Most peoples' concerns were about implementing the rules rather than the rules themselves.

People supported the policies and rules providing for fish passage.

With structures such as bridges and dams the stakeholders supported policies that required possible designs for addressing local community needs and protecting the ecology as well as human functional needs

In 2013, stakeholders recognised that it was desirable for their reclamation activities to have minimal effects upon water course habitats (in stream and on banks) and to avoid reductions to the community's existing uses for waterways. They thought that it was highly likely for any streambank work to increase sediment in the affected waterways and reduce their clarity. However, they wanted opportunities to reclaim areas where that would increase public safety, access and recreation and improve the maintenance and longevity of infrastructure.

Stakeholders asked for rules that would recognise the importance of regionally significant infrastructure and support sustainable development, as well as generally encouraging indigenous biodiversity and improving waterway habitat.

Stakeholders wanted riparian protection from erosion to be part of a whole of catchment approach rather than works undertaken by landowners individually. They were concerned that stabilising one section of stream bank might undermine the banks elsewhere in the same waterway. They did want bank protection through planting and works to continue where that could stabilise a stream channel, protect the ecology and reduce flooding. Stakeholders wanted simple practical rules in this area that would be easy to implement by Council staff and landowners.

Stakeholders wanted provisions in the plan to ensure that any work was done to an appropriate standard, and in keeping with the natural environment. This could best be done by putting in place an accreditation scheme for contractors. They suggested that any work done in riparian areas should benefit the local land users as well as communities, e.g. with fencing, indigenous planting and filtration of runoff. They wanted local iwi to be involved in the consenting process.

Stakeholders asked for a consenting process that could be completed with 24 hours were it was a straight forward situation requiring approval. They suggested a "code of practice" that could be developed by GWRC working with the affected parties.

Stakeholders were concerned that work on regionally important infrastructure like roads and bridges could disadvantage local people, change waterway channels and degrade historically significant areas. They wanted any improvements to be of benefit to local communities. Stakeholders wanted permitted criteria to include: regionally significant infrastructure, public safety and local values. They wanted consent criteria to include: tradeoffs and offsetting and clear guiding policies. The stakeholders suggested that GWRC allow for global consents, prepare best-practice guidelines with other agencies, promote the contribution being made to protect significant values and provide education support about the policies. They wanted GWRC to establish mitigation funds as part of their consent conditions and work with local

committees to plan mitigation and offsetting works. They asked that GWRC put in place a monitoring regime and consent reviews so that the long term consents could be adapted over time.

People did not comment about the policies and rules relating to:

- Drain maintenance
- Fish passage
- Flood protection
- Gravel extraction
- Vegetation removal

## 7.9 Rural Landuse and Water Quality

There was general support amongst the stakeholders in 2012 and 2013 for “rules to protect environmental bottom lines” and an expectation that these would be focussed upon losses from farm systems. The stakeholders wanted GWRC to recognise that water quality was an issue requiring everybody to act more responsibly and not to blame only the region’s farmers. Other stakeholders, while recognising that there was a shared responsibility across the region, did not want this to be used by the agricultural industries to avoid facing up to their contribution towards any water quality problems that might be identified.

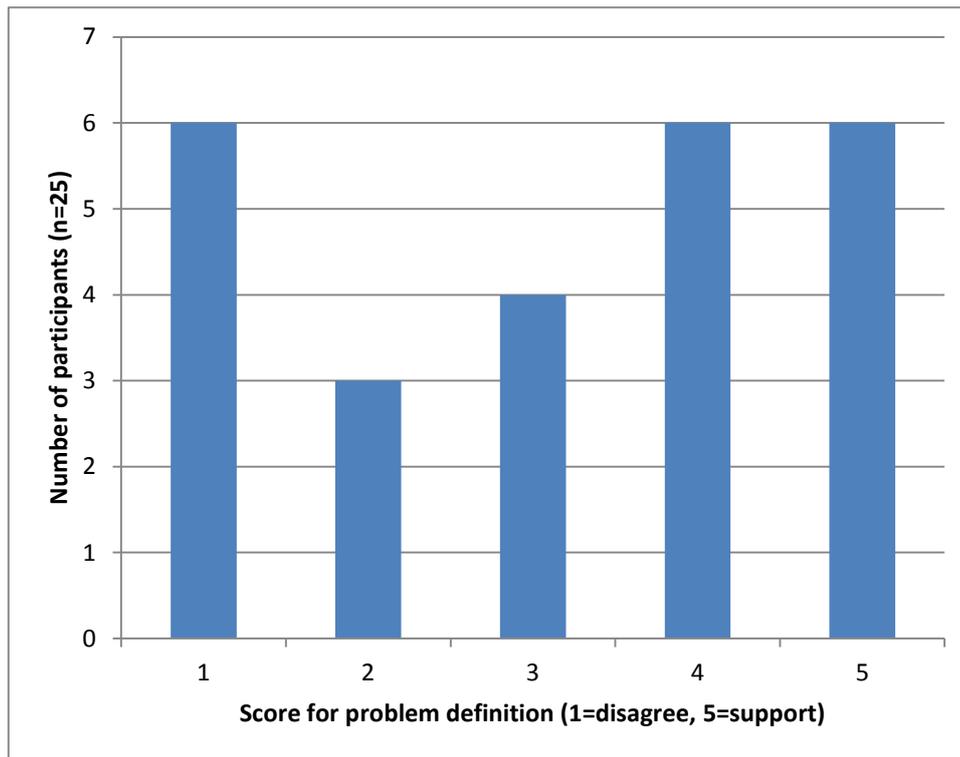
The stakeholders at a workshop in July 2012 considered the problem statement below and then scored it from 1 (disagree) to 5 (support). The results were polarised with both definite agreement and definite disagreement (Figure 1). The average score of 3 actually reflects a minority of the participants.

**Problem Statement:** Agricultural land use is contributing to the impaired health of our region’s freshwater systems.

Some stakeholders were concerned about changes in landuse, e.g. dairying, other stakeholders considered that the priority was to focus on increasing the use of particular management practices, e.g. riparian protection and planting.

The stakeholders considered policies to address: livestock exclusion from waterways, discharges of effluent and compost.

**Figure 1:** Scores for the expected level of organisational support for the policy problem definition – average 3.0



### **Livestock exclusion**

Stakeholders generally liked the principle of excluding livestock from waterways. They supported the uses of fencing and planting to reduce E.coli and sediment levels in waterways. They felt that the possible provisions aligned well with industry initiatives and they considered that any rules should apply universally to all landowners and in all catchments including forestry. Generally they proposed an industry audited approach to encourage compliance.

Some stakeholders considered the rules to be too prescriptive and lacking enough flexibility to be practical. Some stakeholders considered the possible rules were not prescriptive enough. They wanted the rules to state that livestock were prohibited from all waterways, including ephemeral streams, with a few exceptions.

Stakeholders suggested that all sources needed to be accounted for within catchments for load calculations. They wanted transition times of 1-5 years to be available for landowners and they wanted the policies to have measureable outcomes.

The stakeholders were concerned about how E.coli and sediment were affecting water quality. It was unclear to them how the E.coli would be measured and monitored. The stakeholders felt that it would be useful to have a clear definition of where livestock would not be allowed in order to avoid the issues created from having too much E.coli and sediment.

## **Effluent and compost discharge:**

Generally the stakeholders liked the possible provisions that were intended to address discharges of effluent and compost applications. They provided clear guidance to farmers. Some stakeholders wanted GWRC to align its provisions with the Supply Fonterra industry audit. Others preferred the Horizons Regional Council proposed One Plan. The stakeholders wanted policies in the regional plan to ensure that there was no direct discharges of effluent, surface ponding, runoff or drainage to waterways. Any solutions needed to be affordable for farmers.

The use of the pond calculator concerned some people. Stakeholders lacked information to assess the effectiveness of possible rules. This included any information about the effectiveness of the pond calculator, understanding soil types, measuring nutrient losses and sealing ponds.

People had an issue with the high capital costs of putting in storage ponds. Some people felt that using the pond calculator in a rule would limit future innovation. They wanted a holistic farm rule rather than many rules. People supported deferred irrigation as an effluent management practice, but had questions about how to deal with extreme rain events. Some stakeholders were concerned about policies limiting the application of effluent near community drinking supplies. They highlighted that landowners would need the community drinking supply areas mapped.

## **Nutrients**

Stakeholders generally supported the development of nutrient limits and allocation of loads across all landuses and in all catchments. They liked the consistency of having region-wide rules, and that there was enough headroom and it was anticipated that catchment communities would raise standards even higher at a later time. The stakeholders considered that the variability of landuse practices, soils and topography across the region could make any regulatory regime quite costly to introduce. That variability was thought by some to make compliance quite difficult to achieve.

Some stakeholders wanted the nutrient rules to focus upon specific landuses, e.g. dairying, others wanted the rules to encourage the use of best management practices. Some stakeholders considered that farmers had been given enough time to change their practices and the regional plan provisions must be written to halt any further decline in water quality.

Stakeholders expressed mixed feelings about the use of rules formed around either catchment load limits or to require the use of best management practices. Some stakeholders were concerned that if the load limits were very different between catchments it would increase council bureaucracy and compliance costs. There were some suggestions for GWRC to make use of the primary sector and organic industry's self-regulatory schemes with GWRC providing oversight including audited checks.

The stakeholders suggested that the main role of industry was to provide research and innovation for the development of best management practices. They felt that industry could provide advice, incentives and encouragement in order for landowners to become compliant.

The stakeholders suggested that different stakeholders needed different transition times, depending upon whether or not they were new resource users and the size of the changes required. They wanted GWRC to make mitigation/attenuation practices permitted activities. These included: artificial wetlands, barrier ditches, culverts and bridges.

There were three main methods of nutrient allocation suggested: land use capability units (LUC), grandparenting of existing use, or using best management practice benchmarks for each industry. Some stakeholders were very supportive of LUC and some were very against. The stakeholders wanted the resolution of the method of allocation to be something not too complicated and easy to do.

Some stakeholders thought that it would be good to promote organic farming systems and practices as a way of reducing farming's environmental impact.

The stakeholders considered that using guidelines would be better than rules. There were questions from stakeholders about the use of a maximum nutrient loading, and whether it was by catchment or selected for the region. People were concerned that GWRC might not be able to monitor and enforce nutrient limits.

There was a desire by some participants that if best management practices were to be required by the policies and rules in the regional plan, that the practices would need to be clearly described so they could be monitored and enforced, if necessary.

Stakeholders wanted to maintain the level of collaboration right through the development of the provisions in the regional plan. They asked that regional plan development be iterative with stakeholders rather than following a linear sequence to meet a particular timetable. The stakeholders wanted GWRC to spend more time with stakeholders discussing the issues, problems and objectives before policy staff tried to address these in the regional plan. The stakeholders asked for a lot more stakeholder discussion about the suitability of various regional plan methods before the plan was drafted.

Stakeholders wanted to be given more understanding about the science being used to develop policy and for there to be wide use of measureable objectives. Information would be needed at the farm scale as well as the catchment scale. It would need to cover trends and processes rather than detailed information and it would need to include economic as well as environmental effects.

People asked for the provisions in Wellington's regional plan to build on the most effective policies being used by other regional councils. They wanted GWRC to be working with other regional councils to provide consistency between regions in the regional plans.

The stakeholders wanted more discussion about how GWRC proposed to work with industry, landowners and rural communities to implement water quality provisions. In particular they wanted to know that GWRC would be involved in future landuse changes, livestock intensification and industry development. People felt that the key people to involve to encourage changes in practice were those that influenced landowners the most.

To encourage the selection and use of best practices, non-regulatory provisions in the regional plan were suggested by stakeholders. These included education and incentives, and more guidance and assistance for landowners. The non-regulatory provisions would provide the information and resources needed to “empower landowners” ability to make good decisions. Implementation results needed to be promoted around the region so that local communities could support the changes happening on farms.

There were no discussions at this workshop of with stakeholders about: earthworks and vegetation clearance, landfills, mixing waters from different catchments, outstanding water bodies, silage pits, offal holes and contaminated land.

## **7.10 Urban Landuse and Water Quality**

In 2012-2013 stakeholders supported the move towards having stormwater management plans. They supported the principle that the people creating contaminated discharges into stormwater should be required to control the sources before it gets there. They supported the idea that the management plans would be “tuned” to meet the standards required in each catchment. The stakeholders wanted to have more collaboration between GWRC and TAs in the process of granting consents for urban development. This would be assisted if TAs had a common set of bylaws controlling the management of stormwater by developers.

The stakeholders hoped that “global consents” for their stormwater networks would be possible. They wanted the regional plan to ensure that stormwater networks could remove surface water efficiently. They expected that the council would monitor catchment effects taking into account the multiple sources of contaminants.

The stakeholders wanted the regional plan to take into account legacy issues from systems that could be over 100 years old. Some TAs had greater topographical challenges than others and all TAs had the difficulty of dealing with systems where most of the structure was hidden from view.

The stakeholders were concerned though that the regional council expected them to take greater responsibility for what was going into stormwater systems. They wanted GWRC to provide more assistance to TAs to help them manage the inputs. Some stakeholders were uncertain how they could avoid conditions creating erosion risks and how these policies were going to be implemented by GWRC.

For the stakeholders, moving to consented stormwater systems was going to be expensive. They wanted sufficient transition time to be provided so that they

could put them in place without overloading communities with costs. They suggested that GWRC could assist them to put BMP in place for low impact and sustainable designs. The stakeholders were concerned that consent holders might be required to pay the costs of monitoring and enforcement.

The stakeholders suggested that if sediment from new subdivisions was not going to enter waterways it could be a permitted activity. They wanted to know the scientific evidence for the critical measures for areas, sediment concentrations and increases in flow rates. Some stakeholders were concerned about GWRC making some systems non-complying, they considered that to be too “high a bar to hurdle”. Other stakeholders considered such a requirement to be necessary in order to send the appropriate signal to TAs that sewage in stormwater systems is unacceptable.

## **7.11 Significant sites for tangata whenua**

### **Vegetation removal**

There was a recognition by tangata whenua that clearing waterways of aquatic weeds would assist communities and landowners with removing blockages in waterways and maintain their flow so that the risks of flooding peoples’ homes and properties was reduced. Terrestrial vegetation removal could improve the visual appearance of an area. Weed control could be used to enhance areas of native vegetation and restore habitat for mahinga kai.

Tangata whenua were concerned that without controls in the regional plan vegetation clearance could destroy indigenous habitat, disrupt fish breeding and feeding, and reduce sources of mahinga kai. Tangata whenua did not support vegetation removal increasing the public’s access to significant sites or the use of pesticides near significant sites.

Tangata whenua suggested that the regional plan should encourage more use of riparian vegetation and shading to reduce the need for drain cleaning. They wanted more involvement of iwi members (with whakapapa connection to water ways) in work programmes to protect the iwi’s interests. Iwi contractors could assess sites before, after and throughout work programmes to ensure that the needs of flora and fauna were being looked after.

### **Stormwater**

Tangata whenua understood that existing stormwater systems were important for removing surface water from urban areas, but they were concerned that the systems were pumping too much load into receiving environments, beyond their assimilative capacity.

Tangata whenua were concerned that the current stormwater practices were silting up harbours and increasing human health risks for contact recreation. Poor water quality associated with discharges of stormwater was restricting the ability of tangata whenua to gather kai moana and to use traditional areas for recreation and swimming.

Tangata whenua considered that the level of degradation in some areas was beyond the point that recovery was possible and that habitats and spawning areas were being destroyed.

Tangata whenua wanted the regional plan to give greater expression to iwi kaitiaki, and provide opportunities for habitat restoration so that they could again consume kai moana.

### **Water harvesting from streams**

Tangata whenua supported in principle the economic use of water and the in-stream structures required for increased irrigation. Such development could provide more habitat for eels, raise land productivity and improve local employment. Community managed schemes would assist iwi to become more involved and enable them to apply tikanga to managing the resource.

Tangata whenua considered that developments in water use could have negative effects on mauri from an imbalance of natural stream dynamics.

Tangata whenua were concerned that harvesting water for irrigation could have a visual impact making the area undesirable for swimming. Depending on the proximity of historical kainga etc., the waterway might become unsuitable for a range of activities.

They were concerned that they might lose the ability to gather kai and access resources themselves. This would reduce their connection to a waterway and lose inter-generational transmission of cultural knowledge.

Changes in stream flow and nutrient levels might result in toxic algae blooms, increase aquatic weeds, and reduce numbers of indigenous fish.

Tangata whenua wanted the regional plan to provide opportunities for greater community and iwi involvement in any schemes. Their greater involvement in any work undertaken would enable them to look after significant sites and protect cultural values. Iwi kaitiaki could ensure that works had minimal impact upon ecosystems and that opportunities for habitat enhancement were recognised.

## **7.12 Wetlands**

In 2012 Council staff met with Fish and Game, and Fed Farmers several times, and some landowners from around Lake Wairarapa. The discussion was about the identification and protection of significant wetlands.

## **7.13 Water Allocation**

In 2012 stakeholders expressed concern that the definition of over allocation within catchments seemed very arbitrary.

Stakeholders wanted users who increased their efficiency of water use to be rewarded in some way, possibly by providing them with access to additional water if they required it. The stakeholders suggested another way to reward

efficiency improvements was to allow consent holders to sell some of their unused allocation. In over-allocated catchments they wanted existing consent holders to have only what they could use. They felt that maybe a distinction needed to be made in consents between peoples' core allocation and their supplementary allocation. Each would have a different allocation priority over other water users.

The stakeholders considered that if the water quality in a catchment improved that it should mean the minimum flows could be reduced and the water available for allocation increased. Possibly there would be changes in minimum flows over the life of the regional plan anyway as more monitoring information and science became available.

Some stakeholders were concerned that the availability of irrigation water would increase water use and so increase the threat of waterway contamination. They supported allocating some of the future stored water to the maintenance of ecological flows in rivers.

In 2013 the stakeholders supported minimum limits being set for each catchment to guide allocation. They suggested a number of alternative ways of approaching this:

- Ecological in-stream requirements.
- Contact recreation – swimming.
- Percentage of MALF.
- By taking account of in stream contaminant concentrations affecting water quality.
- Seasonal variations in the minimum flows required for water life.
- Accounting for the landuse capability units in each catchment.
- Reflecting the landuses within each catchment and their expected effects upon water quality.
- Based upon 85% of MALF.
- Based upon 50% of MALF.
- Based upon economic necessity.

The stakeholders suggested that the existing consent holders within the same catchment should be moved to renewing their consents on the same date so that they could be managed by GWRC collectively.

To encourage improved efficiency of water use, the stakeholders suggested that GWRC should demonstrate to consent holders that advantages for individuals, catchments and communities, particularly any financial advantages. They thought that GWRC should publish comparable efficiency results so that

people would have benchmarks to compare themselves with. They suggested that landowners should have a reduced number of takes per property and that urban property owners should not be able to take any water from bores without a consent.

The stakeholders felt that if new potential water users moved into an over-allocated catchment, they should not be given any water unless either:

- Existing consent holders reduced their requirements.
- Existing consent holders were able to trade with them part of their allocation.
- There is out of season water available for storage.

The stakeholders in over-allocated catchments believed that existing consent holders should have their allocations modified at renewal by:

- Requiring them to be metered and monitored by GWRC, with encouragement to telemetry the results to GWRC.
- Encouraging them to increase their efficiency, including providing them with financial incentives.
- Only granting consent holders what they have actually used.
- Giving everybody only a percentage of their allocation, as part of a “sinking lid” policy.
- Once everybody is aware of what is happening, removing allocation on a “first in, first off” basis.

To meet community needs in over-allocated catchments the stakeholders recommended that they be required to:

- Increase the storage capacity within their water supply infra-structure.
- Make household metering compulsory within urban areas.
- Encourage the use of household water tanks.
- Grant consents subject to TA’s following a plan to improve community water use efficiency.

If catchments are under-allocated, the stakeholders suggested a number of different policy options:

- First come – first served.
- Allocation by priority; first human, then livestock, then economic.
- Livestock ahead of irrigation (pastoral, cropping or horticulture)

- Based on each additional user improving the overall catchment water use efficiency.
- Enable trading of allocations.
- Linking water allocations to the use of water budgeting and improved efficiency of use.
- Devolve allocation from GWRC to the affected communities.

## **8. Other**

Coastal Marine stakeholders were concerned that not enough work had been done by GWRC to show how stakeholders would be affected by provisions in the regional plan as a basis of attracting peoples' attention to the engagement process.

## **9. Acknowledgements**

Staff at Greater Wellington have appreciated the willingness of participants in the consultation to stay engaged throughout the plan development process. This document is intended to provide a cross-section of all the material used to develop the plans objectives, policies and methods. We apologise if any people feel like their views have not been represented fully in the space available to do so. The guidance of Jonathan Streat has been very helpful in preparing this document, but Terry Parminter (as the author) remains responsible for any errors remaining.

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