



**greater WELLINGTON**  
REGIONAL COUNCIL  
Te Pane Matua Taiao

If calling please ask for: Democratic Services

24 April 2019

## **Te Kāuru Upper Ruamahanga River Floodplain Management Plan Hearing Subcommittee**

Order Paper for meeting to be held in the Wairarapa Sports House,  
Masterton on

**Monday, 29 April 2019 at 7.00pm**

### **Membership of Hearings Subcommittee**

Bob Francis (Chair)

Cr Adrienne Staples  
Stephanie Gundersen-Reid  
Kate Hepburn  
David Holmes

Greater Wellington Regional Council

*Recommendations in reports are not to be construed as Council  
policy until adopted by Council*

## Te Kāuru Upper Ruamahanga River Floodplain Management Plan Hearing Subcommittee

Order paper for the hearing held on Monday, 29 April 2019 in the Wairarapa Sports House, Masterton at 7.00pm

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REGIONAL COUNCIL  
Te Pane Matua Taiao

<b>Report</b>	<b>19.159</b>
Date	24 April 2019
File	CCAB-12-384
<b>Committee</b>	<b>Te Kāuru Upper Ruamahanga River Floodplain Management Plan Hearing Subcommittee</b>
<b>Author</b>	<b>Fiona Standen, Democratic Services Advisor</b>

## **Process for considering submissions on the proposed Te Kāuru Upper Ruamahanga Floodplain Management Plan**

### **1. Purpose**

To brief the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Hearing Subcommittee on the process for considering submissions on the proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan.

### **2. Background**

At its meeting on 11 April 2019 the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee established the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Hearing Subcommittee to consider and hear submissions on the proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan, seek clarification from officers on technical matters and to provide recommendations to the Subcommittee on the plan.

#### **2.1 Public consultation**

The establishment of this Hearing Subcommittee follows an on-going engagement process with the community since 2014 and five rounds of engagement and consultation over the past nine months. The hearing process completes the public consultation on the Te Kāuru Upper Ruamahanga River Floodplain Management Plan.

#### **2.2 Principles of consultation**

Six principles of consultation are set out in section 82 of the Local Government Act 2002. One of these principles is that views presented to a local authority should be accepted with an open mind, and should be given due consideration by the local authority, in making a decision.

It is consistent with best practice that members should be present for the substantial part of the hearing and deliberations in order to participate in the decision-making of the Hearing Subcommittee.

If it is necessary that a member is absent for part of the hearing, it is also consistent with best practice that the member acquaint themselves with the matters raised by persons who presented in their absence.

### **3. Submissions received**

Submissions were received from individual submitters and groups representing parts of the community. A copy of all submissions has been provided separately.

61 submissions were received during the formal consultation process in March-April 2019.

### **4. Submissions process**

#### **4.1 Oral submissions**

The purpose of this hearing is to hear oral submissions in support of written submissions made to GWRC. At the time of writing this paper 13 persons and seven groups have requested that they be heard.

Ten minutes have been allocated to individual submitters appearing before the Hearings Subcommittee. Twenty minutes have been allocated to persons speaking on behalf of a submission made by a community group or organisation.

If the individual or group does not use the full amount of time allocated to them, members may use the remainder of the time to ask the submitter questions.

A hearing schedule has been developed; it will be circulated to members, with a final copy available at the hearing. [Attachment 2](#) to this report contains the draft hearing schedule.

#### **4.2 Consideration of issues raised in submissions**

The Hearing Subcommittee must consider all written and oral submissions. There will be an opportunity to discuss the issues raised in both written and oral submissions once all persons have been heard.

The Terms of Reference for the Hearings Subcommittee are in [Attachment 1](#) to this report.

#### **4.3 Deliberations**

The Hearing Subcommittee must consider all the written and oral submissions it receives at this meeting and must decide its recommendations to the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee. Deliberations will take place during the course of the hearing.

#### **4.4 Process after consideration of feedback**

The Hearings Subcommittee Chair will prepare a report to the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee for its consideration, and recommendation to the Environment Committee for Council to adopt the Plan.

#### **5. Climate Change**

The matters requiring decision in this report have been considered by officers in accordance with the process set out in the GWRC Climate Change Consideration Guide.

#### **6. Communication**

The recommendations from the Hearing Subcommittee will be reported to the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee for its consideration.

##### **6.1 Significance of the decision**

Part 6 requires Greater Wellington Regional Council to consider the significance of the decision. The term 'significance' has a statutory definition set out in the Act.

Officers have considered the significance of the matter, taking the Council's significance and engagement policy and decision-making guidelines into account. Officers recommend that the matter be considered to have low significance.

Officers do not consider that a formal record outlining consideration of the decision-making process is required in this instance.

##### **6.2 Engagement**

Due to its procedural nature and low significance, no engagement on this matter has been undertaken.

#### **7. Recommendations**

*That the Hearing Subcommittee:*

- 1. Receives the report.*
- 2. Notes the content of the report.*

Report prepared by:

**Fiona Standen**  
Democratic Services Advisor

Report approved by:

**Francis Ryan**  
Manager, Democratic  
Services

**Attachment 1:** Terms of Reference

**Attachment 2:** Draft Hearing Schedule

Attachment 1 to Report 19.159

# **Terms of Reference for the Te Kāuru Upper Ruamāhanga River Floodplain Management Plan Hearing Subcommittee**

**April 2019**

## 1. Membership

The membership of the Te Kāuru Upper Ruamāhanga River Floodplain Management Plan Hearing Subcommittee (Hearing Subcommittee) comprises:

- Bob Francis (Community)
- Stephanie Gundersen-Reid (Community)
- David Holmes (Community)
- Kate Hepburn (Community)
- Cr Adrienne Staples, GWRC (Alternate: Cr Barbara Donaldson)

Bob Francis is Chairperson of the Hearing Subcommittee.

The quorum is four members.

## 2. Meeting procedures

All members have equal speaking rights and a deliberative vote. In addition, the Chairperson has a casting vote in the case of an equality of votes.

Members must be present for the substantial part of the hearing and deliberations in order to participate in the decision-making of the Hearing Subcommittee.

## 3. Powers

The Hearing Subcommittee has the power to:

- Consider written and oral submissions on the proposed Te Kāuru Upper Ruamāhanga River Floodplain Management Plan
- Seek clarification from Council officers on any technical matters; and
- Develop recommendations in relation to the proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan for consideration by the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee.

## 4. Responsibilities

The Hearing Subcommittee shall ensure that:

- The hearing and consideration process is carried out in a way that is effective and timely;
- Submitters are provided with the best possible opportunity to be heard in support of their submission;

- Hearing Subcommittee members receive submissions with an open mind and give due consideration to each submission; and
- The decision-making process is robust and transparent.

## **5. Remuneration**

The expenses of members of the Hearing Subcommittee who are elected members of the Greater Wellington Regional Council, Carterton District Council and Masterton District Council shall be met by the council they represent.

Subcommittee members who are not otherwise being remunerated may claim Greater Wellington Regional Council daily meeting attendance allowances and expenses.

## **6. Duration of Hearing subcommittee**

The Hearing Subcommittee is deemed to be dissolved at the end of the decision-making process on the Te Kāuru Upper Ruamahanga River Floodplain Management Plan.

The Hearing Subcommittee will report back to the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee, prior to consideration by the Environment Committee and adoption of the Floodplain Management Plan by Council.

## Schedule for hearing submissions on the proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan as at 18 April 2019

**Table 1: Hearing Schedule 29 April 2019**

<b>Session 1: Monday 29 April 2019</b>			
<b>Submitter</b>	<b>Submission No.</b>	<b>Start Time</b>	<b>Finish Time</b>
Scott Abbott	53	7:00pm	7:10pm
Mike Ashby	11	7:15pm	7:25pm
Duncan Stuart	49	7:30pm	7:40pm
Megan Flynn (TWL)	15	7:45pm	8:05pm
<i>Sustainable Wairarapa (Ian) TBC</i>	25	8:10pm	8:30pm

**Table 2: Hearing Schedule 30 April 2019**

<b>Session 2: Tuesday 30 April 2019</b>			
<b>Submitter</b>	<b>Submission No.</b>	<b>Start Time</b>	<b>Finish Time</b>
Graham Dick	17	8:30am	8:40am
Jill Greathead	23	8:45am	8:55am
Ron Shaw (Wai Voice)	35	9:00am	9:10am
Michael Hewison	58	9:15am	9:25am
Ross Cottle	9	9:30am	9:40am
Graeme Tulloch	9	9:45am	9:55am
Ian Hawkens	24	10:00am	10:10am
<b>Morning Tea Break</b>			
Sally Walker	30	10:30am	10:40am
Forest and Bird (Tom Kay)	16	10:45am	11:05am
Andrew Donald	34	11:10am	11:20am
Ron Garrod	57	11:25am	11:35am
CDC – Mayor John Booth	61	11:40am	12:00pm
<b>Lunch Break</b>			
Richard Butler	20	1:00pm	1:10pm
Phil Teal (Fish and Game)	54	1:15pm	1:35pm
Chris Peterson	14	1:40pm	1:50pm
John Barton	60	1:55pm	2:05pm
<i>Sustainable Wairarapa TBC</i>	25	2:10pm	2:30pm

*NB: Ron Shaw (Wai Voice) has indicated that 10mins is sufficient.*



**greater WELLINGTON**  
REGIONAL COUNCIL  
Te Pane Matua Taiao

<b>Report</b>	<b>19.160</b>
Date	16 April 2019
File	CCAB-12-383
<b>Committee</b>	<b>Te Kāuru Upper Ruamāhanga River Floodplain Management Plan Hearing Subcommittee</b>
<b>Author</b>	<b>Francie Morrow – Project Manager, Floodplain Management Plans</b>

## **Proposed Te Kāuru Upper Ruamāhanga Floodplain Management Plan Submissions Overview**

### **1. Purpose**

To provide an overview of the submissions received on the proposed Te Kāuru Upper Ruamāhanga River Floodplain Management Plan (Te Kāuru FMP) and to seek the Hearings Subcommittee recommendations on the Te Kāuru FMP for consideration by the Te Kāuru Upper Ruamāhanga River Floodplain Management Plan Subcommittee (Subcommittee) on 28 May 2019.

### **2. Background**

At its meeting on 21 March 2019 the Environment Committee resolved to release the proposed Te Kāuru FMP for a final round of formal public consultation.

The proposed Te Kāuru FMP incorporates all three volumes of the draft Te Kāuru FMP and changes resulting from the initial rounds of public engagement on the draft volumes.

On 11 April 2019 the Subcommittee resolved to establish a hearing subcommittee to consider written and oral feedback on both the proposed Te Kāuru FMP. The Subcommittee also adopted terms of reference for the hearing subcommittee.

### **3. Public engagement and consultation undertaken**

#### **3.1 Engagement on the draft Volumes 1, 2 and 3 of the Te Kāuru FMP**

Through the development process of the Te Kāuru Upper Ruamahanga River Floodplain Management Plan, there have been a number of stages of engagement with the community including riverside landowners. Table 1 summarises the engagements period that have been undertaken.

**Table 1: Summary of stages of engagement and consultation**

Stage	Dates	Purpose	Number of people engaged*
Stage 1	16 July to 16 September 2018	To seek feedback on draft versions of Volume 1 – Background and Overview and Volume 2 – Location Specific Values, Issues and Responses	400
Stage 2a	1 to 11 November 2018	To present updated draft flood maps for the Waipoua River through Masterton urban area	140
Stage 2b	6 to 9 December 2018	To discuss with the public the possible flood management approaches and options for the Waipoua River through the Masterton urban area	81
Stage 2c	23 February to 5 March 2019	To seek feedback and discuss the proposed flood management approaches for the Waipoua river through Masterton urban area, Volume 3.	189
Stage 3	13 March to 14 April 2019	To consult with the rural and urban communities on the proposed Floodplain Management Plan	532

\*These numbers do not include social media, website hits or external publications

The Subcommittee has received reports on the various stages of engagement at meetings and workshops following each of the engagement and consultation stages.

### **3.2 Feedback on the draft Volumes 1, 2 and 3 of the Te Kāuru FMP**

During Stages 1, 2a, 2b and 2c of public engagement, feedback was sought from the community on the various volumes of the draft plan. Various changes were made to the FMP as a result of these engagement processes, these were workshopped and reported to the Subcommittee, Environment Committee and Council.

### **3.3 Submissions on the proposed Te Kāuru FMP**

Submissions were invited on the proposed Te Kāuru FMP during the final round of consultation. Submissions were received online (by online form), email and mail. Submissions closed on 14 April 2019.

A table summarising the 61 submissions received on the proposed Te Kāuru FMP is included as [Attachment 1](#) to this report.

A report outlining the key themes of the submissions is included as [Attachment 2](#) to this report.

## **4. Officers' comments in response to submissions**

Officers' comments on the submissions are included as [Attachment 3](#).

### **4.1 Submissions in support and neutral**

Eight submissions were received in support of the proposed Te Kāuru FMP and 13 were neutral.

### **4.2 Submissions opposing in part**

40 submissions were received opposing in part the proposed Te Kāuru FMP. The majority of the submissions cover similar issues regarding:

1. Extend the submissions deadline until completion of the independent audit of the hydrological model;
2. The Te Kāuru FMP should be a community led process;
3. Concerns regarding giving the river more room;
4. Concerns regarding planting of the buffers, including weed control;
5. Land loss compensation; and
6. Concerns regarding the proposed funding model.

#### 4.2.1 Extend the submissions deadline until completion of the independent audit

An independent audit of the hydrology and hydraulic modelling process is currently being undertaken by Land River Sea Consulting Ltd. It has been requested by 24 of the submitters that the submissions process be extended until the outcomes of the independent audit are known.

The independent audit follows earlier peer review processes for both the hydrology and the hydraulic modelling. The hydrological assessment of the hydrology and the peer review of the hydraulic modelling were also undertaken by consultants that were jointly engaged by Masterton District Council and GWRC.

The independent audit report is due on 17 May 2019. The Te Kāuru Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019, prior to the adoption of the plan.

#### 4.2.2 The Te Kāuru FMP should be a community led process

Greater Wellington Regional Council is happy to work with community groups and members throughout the implementation of the Te Kāuru FMP. The governance structure outlined in the proposed FMP enables significant input from the community through the River Management Groups and the Upper Ruamahanga River Management Advisory Committee. The Hearing Subcommittee should consider how a community group focussed on the urban reach of the Waipoua River can be incorporated into the governance structure. There is significant opportunity available for the community to be involved in the process, particularly during Stage 1 of the implementation of the urban reach.

#### 4.2.3 Concerns regarding giving the river more room

Several of the submissions received indicate that they are concerned about the proposal to allow the river to migrate into the buffer more frequently than at present. It is important to note that we are not proposing to change the width of the buffers at this stage except in four isolated locations that have already been discussed with landowners. However, following comments from earlier consultation a complete review of the design lines is included as part of implementation of the FMP.

The concepts and common methods within Te Kāuru provide the overall long-term strategy for the catchment. It is acknowledged that each reach and each location within the catchment will need to be managed on a site-by-site basis.

#### 4.2.4 Concerns regarding planting of the buffers, including weed control

Section 4.4.2 of the proposed Te Kāuru FMP outlines a process for pest plant and animal management. The Hearing Subcommittee may wish to consider an extension of GWRC management of weeds within the buffer from two years up to three or possibly five years. This would mean increasing the cost estimates for the riparian management officer to accommodate this additional time to \$120,000 per annum rather than the \$60,000 currently proposed. Costs regarding spray and bait to manage pests have already been incorporated into the proposed FMP for the life of the plan.

#### 4.2.5 Land loss compensation

The proposed Te Kāuru FMP does not propose compensation for loss of land; however, the FMP outlines funding for GWRC to buy land (within the buffer only) where a landowner would prefer to sell rather than retain ownership. Purchase of land, if requested, would be considered on a case by case basis. We acknowledge there will be some additional erosion as a result of this proposal.

#### 4.2.6 Funding model concerns

The funding model proposed in the FMP will be tested through the Revenue and Financing Policy and will be subject to public consultation before it is enacted.

### 5. Delivery of the final Floodplain Management Plan

The Hearing Subcommittee recommendations on the proposed Te Kāuru FMP will be presented to the Subcommittee for consideration. The Subcommittee's recommendations will then be presented to the Environment Committee.

### 6. Amendments

#### 6.1 Matters raised in submissions that affect methods proposed

The Hearings Subcommittee must consider submissions that request changes to the methods proposed by the floodplain management plan and make recommendations on any changes to the proposed Te Kāuru FMP after the consideration of the submissions and technical advice from officers. These matters include:

- Extending the submission deadline
- Halting the process and establishing community led FMP development
- Changing the river management envelope method or plan for implementing this method
- Changing the riparian planting of buffers method or plan for implementing this method
- Changing the pest management in the riparian buffers method or plan for implementing this method
- Compensation for loss of land due to erosion

- Changing the proposed funding approach

The Hearings Subcommittee must also consider specific changes requested by submitters as outlined in Attachment 2.

## **7. Consideration of climate change**

The matters addressed in this report have been considered by officers in accordance with the process set out in the GWRC Climate Change Consideration Guide.

### **7.1 Mitigation assessment**

*Mitigation assessments are concerned with the effect of the matter on the climate (i.e. the greenhouse gas emissions generated or removed from the atmosphere as a consequence of the matter) and the actions taken to reduce, neutralise or enhance that effect.*

Officers have considered the effect of the matter on the climate. Officers recommend that the matter will have an effect that is not considered significant.

Officers note that the matter does not affect the Council's interests in the Emissions Trading Scheme (ETS) or the Permanent Forest Sink Initiative (PFSI)

### **7.2 Adaptation assessment**

*Adaptation assessments relate to the impacts of climate change (e.g. sea level rise or an increase in extreme weather events), and the actions taken to address or avoid those impacts.*

GWRC plans for climate change in assessing the degree of future flood hazard and in determining an appropriate response. There are only specific, limited situations in which climate change is not relevant (for example, planning for present-day emergency management).

In assessing flood hazard and determining appropriate structural and/or non-structural responses in areas subject to flood risk, GWRC is applying a rainfall increase of 20% to the flood hydrology in the FMP to account for climate change over the next 100 years.

Guidance from the Ministry for the Environment will be updated from time to time and our approach will be revised in line with any updates.

## **8. The decision-making process and significance**

No decision is being sought in this report.

### **8.1 Engagement**

Engagement on this matter is unnecessary.

## 9. Recommendations

*That the Hearing Subcommittee*

1. *Receives the report.*
2. *Notes the content of the report.*
3. *Considers the submissions received on the proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan*
4. *Reports its findings and recommendations on the Te Kāuru Upper Ruamahanga River Floodplain Management Plan to the Te Kāuru Upper Ruamahanga River Floodplain Management Plan Subcommittee.*

Report prepared by:

**Francie Morrow**  
Project Manager,  
Floodplain Management  
Plans

Report approved by:

**Andy Brown**  
Team Leader,  
Investigations, Strategy  
and Planning

Report approved by:

**Graeme Campbell**  
Manager, Flood  
Protection

Report approved by:

**Wayne O'Donnell**  
General Manager,  
Catchment Management

**Attachment 1:** Summary table of submissions

**Attachment 2:** Key themes report

**Attachment 3:** Officers' comments on submissions

## Proposed Te Kōwhiri Upper Ruamahanga River Floodplain Management Plan

No.	Name	Do not make my personal contact details public (2)	Support (8)	Neutral (13)	Against (40)	Wish to be heard (20)	Extend submissions due to independent audit (24)	Should be community led (14)	Giving the river more room concerns (11)	Planting the buffers (weed control) concerns (10)	Land loss compensation (8)	Funding model concerns (6)	Other issues
1	Dean Wilkinson				✓	Yes No			✓	✓			
2	Des Ward			✓		No							Masterton needs water storage!
3	Daniel Hughes			✓		No							Nothing written in submission
4	Michelle Romia			✓		No							Nothing written in submission
5	Jim Simmons		✓			No							
6	Rex Feremor		✓			No							Continue metal extraction
7	Kate & Mike Spackman				✓	No			✓	✓	✓		
8	Alister Reid				✓	No			✓	✓	✓		
9	Ross Cottle and Graeme Hugh Tulloch (joint submission)				✓	Yes			✓	✓	✓		
10	Giuseppe Cugliari			✓		Yes No							Please reduce cost of works through Waipoua urban reach so our insurance costs don't increase
11	Michael Ashby				✓	Yes			✓	✓			Gravel extraction should continue.
12	Michael Playford			✓		No							Put dams in
13	Iain Bowbyes			✓		No							Can we please have a swing bridge crossing the river by the rail bridge?
14	Chris Peterson			✓		Yes						✓	
15	Megan Flynn TWL Property Holdings Ltd				✓	Yes					✓	✓	
16	Tom Kay Forest & Bird		✓			Yes							
17	Graham Dick				✓	Yes							Erosion already happening in Waipoua urban reach due to trees being removed
18	Rangitane O Wairarapa Inc.			✓		No	✓	✓					Concern over water quantity and quality. Lack of submission.
19	Kate Spackman & Mike Geenty			✓		No							Concern over River Rd major project, specially groyne placement
20	Richard Butler				✓	Yes							Lack of specification. Should have specification of island build up being no more than 300mm above normal water level.

## Proposed Te Kōuru Upper Ruamahanga River Floodplain Management Plan

No.	Name	Do not make my personal contact details public (2)	Support (8)	Neutral (13)	Against (40)	Wish to be heard (20)	Extend submissions due to independent audit (24)	Should be community led (14)	Giving the river more room concerns (11)	Planting the buffers (weed control) concerns (10)	Land loss compensation (8)	Funding model concerns (6)	Other issues
21	Shelley and Bob Hall				✓	No			✓	✓		✓	
22	Benjamin Evemy			✓		No							Please do not stop river water being taken for the Queen Elizabeth Park lake. The water runs back into the river when lake levels are sufficient. If the flow got completely stopped the lake would turn into a bog.
23	Jill Vivian Greathead				✓	Yes	✓	✓					
24	Ian Hawken				✓	Yes	✓	✓					
25	Sustainable Wairarapa				✓	Yes	✓	✓	✓	✓	✓	✓	
26	Bridget Evans	✓			✓	No	✓						
27	Masterton Trust Lands Trust				✓	No	✓						
28	Wendy Leitner			✓		No							If it is to the good of the whole district I am in favour, if not then we submit to the majority.
29	Perry Cameron			✓		No							Plan does not consider downstream effects
30	Sally Walker	✓			✓	Yes							Stop removing trees, maintain them instead
31	Giuseppe Cugliari				✓	No	✓						
32	Lynton Baird				✓	No	✓						
33	Anna Baird				✓	No	✓						Allow more public access to the Oxford Street side of the Waipoua River
34	Andrew Richmond Donald				✓	Yes	✓	✓					Agree with Ian Gunn's submission
35	Wairarapa Voice Inc				✓	Yes	✓	✓				✓	Does not consider downstream effects. Costs are substantially under documented
36	Carol and Malcolm MacDonald				✓	No	✓	✓					
37	David Famularo		✓			No							Would like to see crossblading halted
38	Bronwyn Reid				✓	No	✓	✓					
39	Gaylene Rodgers				✓	No	✓	✓					
40	Steve Rodgers				✓	No	✓	✓					
41	Anne Donald				✓	No	✓						Spending on fixing the problem without any measures of prevention would be a misuse of public spending
42	Helen Elizabeth Dew				✓	No	✓	✓					
43	Mark John Hall				✓	No	✓	✓					
44	Brian Michael Barton				✓	No	✓						

## Proposed Te Kōwhiri Upper Ruamahanga River Floodplain Management Plan

No.	Name	Do not make my personal contact details public (2)	Support (8)	Neutral (13)	Against (40)	Wish to be heard (20)	Extend submissions due to independent audit (24)	Should be community led (14)	Giving the river more room concerns (11)	Planting the buffers (weed control) concerns (10)	Land loss compensation (8)	Funding model concerns (6)	Other issues
45	Billy Denton				✓	No	✓	✓					
46	Robyn Williams, Kevin Wilson and Brad Wilson				✓	No	✓						
47	Stuart James McKenzie		✓			No							Would like to see more funding and manpower on Whangāehu River to remove cracked willow and establish plantings.
48	Di Chesmar				✓	No	✓						
49	Duncan Richard Stuart				✓	Yes			✓	✓	✓		
50	Kyle Wells				✓	No			✓		✓	✓	
51	Garth Baylis				✓	No	✓						
52	Garry Daniell				✓	No							There is no need for our property to be considered within your floodplain considerations.
53	Scott Abbott				✓	Yes			✓	✓			Planting will destroy our river views. No need to fix what isn't broken. Remove 1030 Norfolk Road from the proposed FMP. Please refer to submission for more details
54	Fish and Game			✓		Yes							Please refer to submission for more details
55	Margaret Phebe Feringa		✓			No							With your positive plan and the work of farmers, towns people, communities, we can look forward to a better future.
56	Late Submission Powerco		✓			Yes No							Please correct reference of lines from 'transmission lines' to sub-transmission' or 'distribution lines'. Please refer to submission for more details
57	Late Submission Ron Garrod				✓	Yes			✓	✓	✓		Submission is restricted to the rural Waipoua River. Agree with governance structure proposed
58	Late Submission Michael Richard Hewison				✓	Yes	✓	✓					Concerns over costs and need for community input
59	Graham McClymont				x	No	✓	✓					
60	Late Submission AJ Barton				✓	Yes	✓						
61	Late Submission Carterton District Council		✓			Yes				✓			

# Te Kāuru Submissions - Key Themes Report 20190418

Key Themes from Submissions  
Prepared for Greater Wellington Regional Council

18 April 2019



## Document Quality Assurance

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Prepared by:	Sherilyn Hinton Planner, Associate Principal Boffa Miskell Limited	
Reviewed by:	Rhys Girvan Landscape Planner, Senior Principal Boffa Miskell Limited	
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## 1.0 Introduction

This report provides a summary of the key themes raised in the submissions made on the Proposed Te Kāuru Upper Ruamāhanga Floodplain Management Plan (“the Te Kāuru FMP”).

Consultation on the Te Kāuru FMP ran from 13 March to 14 April 2019. A total of 61 submissions (including 5 late submissions) were received (refer **Appendix 1** for table of submitters).

The Te Kāuru FMP addresses the Te Kāuru Upper Ruamāhanga catchment which encompasses the upper reaches of the Ruamāhanga River to the Waiohine confluence, and includes the Waipoua, Waingawa, Kopuaranga, Whangaehu, and Taueru (Tauweru) rivers from their headwaters within the Tararua Ranges and Eastern Hills to their confluences with the Ruamāhanga River – as shown on the catchment map in **Figure 1**.

The Te Kāuru FMP sets out the proposed approach to flood and river management across the catchment over the next 30-40 years.

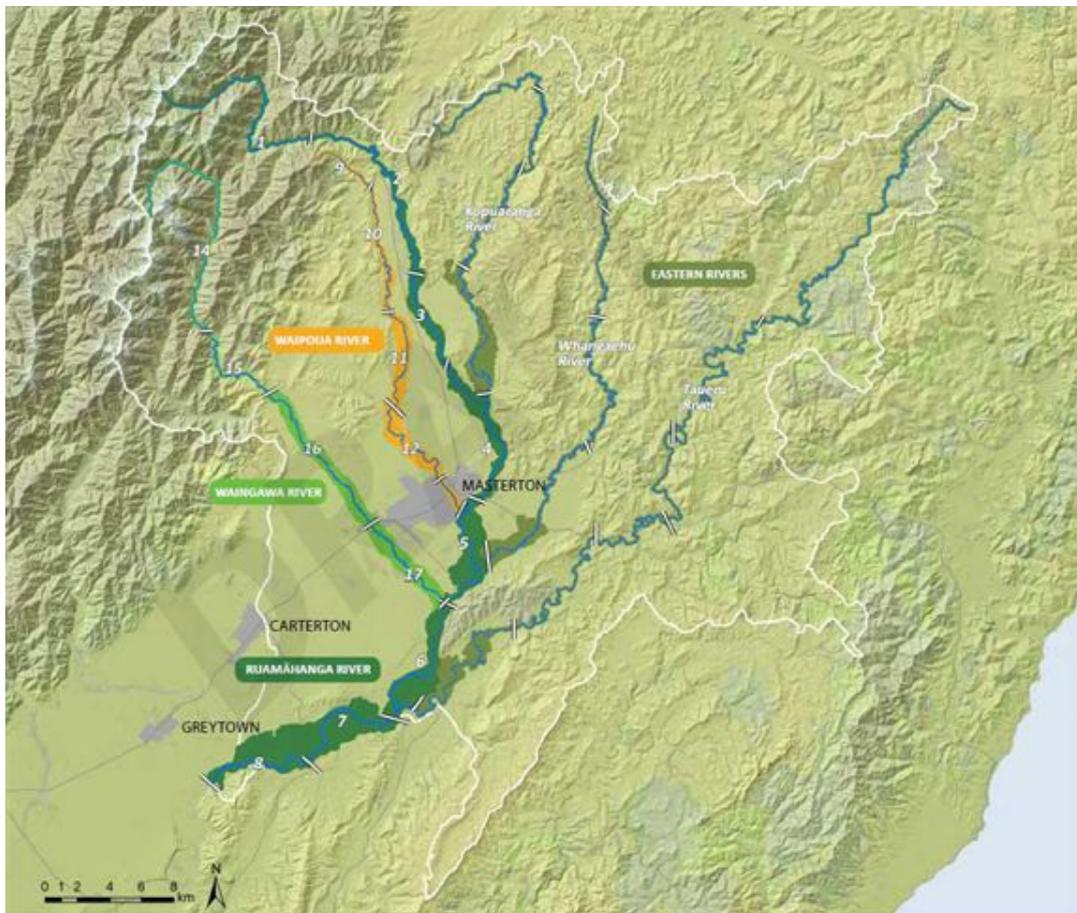


Figure 1: Upper Ruamāhanga Catchment

## 2.0 Overview of Submissions

A total of 61 submissions were received on the Te Kāuru FMP (including 5 late submissions).

In terms of the submissions received:

- 40 submissions opposed the FMP
- 8 submissions supported the FMP, and
- 13 submissions were neutral (neither opposed or supported the FMP).

The key topics / themes raised by submissions are outlined in the following sections of this report. Topics / themes attracting the most submissions included:

- The proposed flood and erosion management responses and methods, and particularly the proposed buffer management approach and the perceived implications of the approach including compensation for lost land, increased need for plant and animal pest management, riparian planting and management, and retaining current methods of river management
- The retention of gravel extraction as a key river management method
- Implications and considerations for recreational activities, uses and public access
- The proposed implementation approach for Te Kāuru, including funding/cost sharing, and governance structures and processes
- The Te Kāuru development process, the submissions process and short timeframes, the quality of information used to develop the FMP, and requests to delay the FMP process to allow consideration and incorporation of the results of the independent review of river modelling.

In terms of specific areas and reaches within the Te Kāuru Upper Ruamāhanga catchment, the Waingawa River (particularly Reach 16: Upper Plains and Reach 17: South Masterton), and the Waipoua urban reach through Masterton (Reach 13), received the most submission points.

## 3.0 Key Submission Themes

The following sections highlight the main issues raised in submissions – with issues being broken down and discussed under key theme headings.

### 3.1 Overall support for Te Kāuru

Several submitters (**Submitters 5, 6, 14, 25, 28, 54, 55, 56, 61**) expressed support for the Te Kāuru FMP, or for particular aspects of the FMP's proposals. This included support for the approach in developing the FMP and consulting with landowners, the overall direction of the FMP and its recognition of changing values and mindsets in the community, the recognition of the ecology of the river systems, and the proposed buffer management approach which is based on the key principle of giving the river more room to move.

**Submitter 5** lives on the confluence of the Ruamahanga and Kopuaranga rivers and has paid attention to the floodplain management plans over the years. The submitter considers that the Council is taking care to get the FMP right, to consult with adjacent landowners, to balance the issues regarding landowners, agricultural commerce, ecology and the long-term health of the rivers in all these regards. The submitter fully trusts the council to be responsible in creating a balanced plan that will serve us for the long term.

**Submitter 6** supports the FMP but wants metal extraction continued to keep the river within its boundaries.

**Submitter 14** supports the overall direction and thrust of the FMP in as far as it takes on board changing values and mindsets in the community at large including many of the landowners more directly affected by the river and its moods. The submitter supports the move away from the narrower and more singularly focused response to floods and erosion that has prevailed to this point, to an approach that includes recognition and inclusion of the mana whenua worldview and values. The submitter considers the FMP better reflects the greater appreciation in the wider community of indigenous flora and fauna and a hankering for more balance in the landscape between the pastoral (and even industrial agricultural) and viable native habitats and ecosystems. Alongside their support of the FMP, the submitter also signals the need to resolve issues and challenges in regard to the sharing of FMP implementation costs and in terms of the amount of plants required for planting of buffer areas, the implications for fencing needs, pest control, weeding and maintenance, as well as the opportunities for job creation for the community.

**Submitter 25** notes strong support for the development of wider buffer zones interplanted with natives and wider river channel.

**Submitter 28** identifies that if this is for the good of the whole district then they are in favour, if not then the submitter submits to the majority.

**Submitter 54** states that the FMP provides a positive first step away from the current engineering heavy approach to river management by incorporating the simple principle of “allowing the river more room to move”. Allowing the river to naturally move within its flood plain, within reason, and with appropriate human intervention (such as an agreed planting programme) will over time reintroduce natural elements to the system that have been lost.

**Submitter 55** applauds the recognition of the ecology of the river systems in the floodplain and how best to improve this by:

- A shift in the approach to the management of buffers and giving the river more space to carry out its natural processes
- In section 3.2.5 by proposing to plant buffers with mixed vegetation of willows and natives to help reduce the amount of erosion to buffers with planting of grasses on the shady side of banks to create habitat for food chains, spawning;
- In section 3.2.8 by developing pool, run and riffle envelopes and the important of this in a river system to help create the variety of habitats for fish and invertebrate life, improving biodiversity and water quality.

**Submitter 55** states that in an age where insect life is steadily declining worldwide and our native fish are endangered or critically threatened, we need to do what the plan is proposing.

**Submitter 56** supports the intent of the FMP to establish a framework to facilitate the safety of people and property by proactively managing flood and erosion risks throughout the Te Kōwhiri Upper Ruamahanga catchment.

**Submitter 61** supports the new approach to managing rivers in the Te Kāuru FMP, the principles outlined in Section 2.2 (in particular the approach to allow the rivers to behave more naturally) and looks forward to working alongside GWRC in the implementation of the FMP.

### 3.2 Te Kāuru vision, principles and objectives

**Submitter 61** supports the vision and principles for the management of the rivers but notes that the Carterton District Council's LTP community outcomes have changed since the commencement of the Te Kāuru FMP development process, and while the sentiment is the same (and the FMP vision remains in alignment), the community outcomes are now:

- A strong community
- A prosperous economy
- A healthy natural and built environment
- Quality, fit-for-purpose infrastructure.

**Submitter 54** seeks stronger acknowledgement in the FMP to achieve the following outcomes:

- Improve ecosystem health (i.e. indicators monitored by MCI and fish counts)
- Maintain and improve habitat quality and extent for trout and native fish
- Maintain and improve habitat for terrestrial species including game birds through riparian and adjacent wetland management
- Improve trout fishery robustness through maintaining and enhancing diversity of habitat
- Maintain and improve recreational access including for trout fishing and other outdoor pursuits.

Given these outcomes, **submitter 54** seeks that other community values need to be incorporated into the FMP to ensure multiple objectives are defined, monitored, and help define river management principles in subsequent implementation. The submitter requests that the following multiple objectives that flow naturally from a wider floodplain management approach be clearly stated in the FMP:

- a. Maintaining ecosystem health
- b. Improved recreational value of the river system
- c. Increased public access for recreational use
- d. Enhanced habitat for all aquatic life within the catchment
- e. Enhanced wetland habitat.

### 3.3 Issues with Buffer Management Approach

The Te Kāuru FMP proposes a key shift in the approach to the management of river buffer areas. The proposed approach is to give the river more room by allowing the river to move within the whole buffer, rather than constraining it and managing it within the inner management line which has been the approach taken previously. The FMP also indicates that where possible, retreat or removal of assets out of the buffer area should occur.

Several submissions raise concerns about the change in river management approach proposed by the Te Kāuru FMP, particularly the buffer management approach and the perceived impacts of giving the river more room to move on private land use and land value adjacent to the river. Several submitters who own and farm land next to the river expressed concerns about the likely

loss of productive land as a result of this approach and want assurance that they will be appropriately compensated for any loss that occurs.

A number of submitters also raised issues in terms of the buffer approach creating more invasive weed and animal pest issues on river margin areas which will be difficult and expensive to control.

The range of issues related to the proposed Te Kāuru buffer management approach are summarised under the following sub-headings:

- Loss of land, lack of compensation and boundary concerns
- Retain current methods of controlled maintenance
- Use natural systems to reduce flood risk
- Use natural systems to reduce flood risk
- Riparian planting and management of buffer areas
- Increased need for pest and weed control in planted buffer areas
- Infrastructure within buffer areas – costs of installation, addressing flood damage and who pays
- Management of river characteristics

### 3.3.1 Loss of land, lack of compensation, and boundary concerns

**Submitters 1, 7, 8, 9, 15, 17, 19, 21, 49, 50, 53** oppose the proposed buffer management approach and the idea of giving the river more space to carry out its natural processes. These submitters raise concerns about the loss of productive soils and land that will result from the giving the river more room and the lack of any recognition or provision for compensation if such loss of land does occur.

Specific submitter comments related to the 'loss of land/compensation' theme include:

**Submitter 1** opposes the approach of letting the river meander to the outer edge of the buffer, particularly in their reach of the Waingawa<sup>1</sup>. The submitter states that once the river is close to the private land on the edge of the buffer, it will only take one large flood event to erode possibly meters (which they state is common on the edge of the Waingawa due to the nature of the vulnerable composition of the banks) of private land. The submitter states that the system of letting the river meander will ultimately result in loss of private land and loss in land value, and if this happens they will seek some form of compensation.

**Submitter 7** provides conditional support but is concerned about the implications of the proposed buffer management approach and giving the river more space to flow on their land. The submitter states that while they want to do their part (and now is the time to start doing something as the water situation in the Wairarapa is only going to get worse), they also do not want to lose land unless they are paid for it.

**Submitter 8** farms on the boundary of the Waingawa River<sup>2</sup> and opposes the extension of the buffer zone. The submitter has four main concerns with the buffer approach as follows:

<sup>1</sup> From the submitter's contact details, this appears to be Waingawa Reach 16 - Upper Plains

<sup>2</sup> From the submitter's contact details, this appears to be within Waingawa Reach 17 – South Masterton

- Control of invasive/noxious weeds within buffers and who pays for this.
- Loss of productive soils - a buffer zone would take away most of the submitter's productive silt loam soils (in contrast to stony terrace land). These soils also have superior moisture retention in summer and the submitter does not irrigate.
- Compensation for lost land - the submitter's recent purchase of 'Springfield Farm' indicates that the value of one hectare of land is approximately \$35,000. Any loss of land would have to be compensated for at this level and would be in tandem with a rates reduction on land taken away. The submitter states that this is productive land not river accretion, as can be seen from the title boundaries.
- Costs of damage to infrastructure - it is not reasonable to expect farmers to pay for damage to infrastructure while paying rates to WRC/MDC if the Waingawa River is allowed to ricochet from one bank to another without ongoing maintenance to the existing fairways.

**Submitter 9** opposes the plan to acquire land from adjoining properties to create margins to allow the river to meander. The submitter is concerned that this will cause a lot of erosion, will put a lot of sediment into the river, and will replace good soil with gravel. Their greatest concern is the lack of provision for affected farmers to be compensated for the loss of productive land (which they consider will be significant). The submitter estimates that at an average price of \$30,000 per ha, there will be 170ha of land required along the Waingawa at a cost of approximately \$5 million, plus further cost for affected infrastructure such as irrigators. The submitter considers it is wrong for land owners to be expected to pay for this and states that if this approach is what the community wants, then the community should be prepared to pay for it. Their view is that the present river scheme has kept fairways clear and the amount of river works has steadily decreased and now only requires maintenance in isolated patches.

**Submitter 15** opposes the plan for the management of the Waingawa River flooding. The submitter strongly objects to surrendering or selling off 30m their property for soft protection and riparian planting. Having witnessed strong erosion by the river on their property in recent years following consecutive heavy freshes, they do not agree with the 'science' put forward suggesting soft barriers and pretty trees are the best solution. This may work for other areas along the river, but will not work on the submitter's property. The submitter's property is immediately downstream of the rail bridge and State Highway 2 road bridge and as a result of river design work to protect these bridges, their property gets hammered. The submitter suggests that armoured protection is put in place for their property instead.

**Submitter 17** suggests that the strategy may have to be re-thought as the removal of trees on the upstream side of the Colombo Road bridges is already resulting in erosion of the river banks. If this continues the abutments of the bridges will be put at risk. Removal of trees along the riverbanks may assist in flood remediation but the consequences in erosion of the riverbanks may be severe and require major engineering to mitigate.

**Submitter 21** identifies that they have already had land taken at 10% of its value by the GWRC as a buffer zone but has been washed away along with the fences they built. The submitter notes that promised big machinery coming to area to improve the river management never happened because of lack of money and that as landowners adjoining the river they are already paying rates. The submitter queries how the costs are going to be spread over the wider community and whether this will be through paying more rates.

**Submitter 49** states that the plan as currently proposed would have a severe impact on the financial viability of the submitter's relatively small dairy farm, which has been farmed by the

submitter's family for 90 years. The submitter is concerned that they could lose 4ha of prime grazing land with the proposal.

**Submitter 50** states that the "giving the river room" concept will diminish the area being farmed on private land, for no benefit to landowners. If this was to go ahead, what compensation is proposed for landowners? Given that this change in river management has nothing in it for landowners, is the community willing to pay for these community values driven changes? The submitter states that the negative financial impact on landowners must be recognised and compensated if this proposal is to go ahead. The submitter also states that once the river gets into an erosion area, it's difficult to get out (and substantially more expensive, thereby diminishing any scheme reserves and effectiveness). In addition, further bank erosion will tip more sediment into the river thereby exacerbating the problem.

**Submitter 53** is concerned about the strategy to proceed with the river buffer (which appears unchanged since their last submission on the draft FMP). This approach will put the submitter's house site at risk by undermining the nearby cliff as well as compromising many of the key attributes of the property from a resale perspective (refer to details and maps provided in the submission). The submitter questions whether GWRC will be compulsorily acquiring affected sites such as their property. The submitter also states that planting will destroy their river views and there is no need to fix what isn't broken. The submitter requests removal of 1030 Norfolk Road from the proposed FMP.

### 3.3.2 Retain current methods of controlled maintenance

**Submitter 21** feels that the Te Kāuru Floodplain Management Plan is only deferred maintenance. The submitter strongly supports retaining the current system of controlled maintenance and believe it is working. The submitter considers that at the moment the river has a good channel down it and with regular maintenance this can be kept clear of islands and too much build up, and that there should be no need to widen the buffer zone. The submitter believes that by leaving the river to run its course over the next few years it is going to cost a lot of money down the track when it is out of control and lots more land has been lost. The submitter has raised that they have already had land taken at 10% of its value by GWRC as a buffer zone of which has been washed away along with the fences.

**Submitter 49** states that the Williams plan is working well now that the trees are fully-grown – they stop the bank from eroding while allowing the floodwater to filter through these trees and spread out naturally over the flood plain. The Te Kāuru FMP will mean these well-established willows, that once contained the river, will be allowed to be washed away by the river, along with up to 50m width of young trees. These trees will be deposited on islands of gravel in what was once the riverbed, and once the river gets in this position it will bounce back and forth creating havoc just like in the 70's and 80's. The submitter says to control the banks and let the water filter through the trees and deposit the silt onto the wide flood plain.

**Submitter 50** states that the current scheme has been operating successfully for decades and hundreds of thousands of dollars has been contributed by landowners to get the river largely flowing through a consistent channel. This substantial investment is quickly eliminated if the river is allowed "more room".

**Submitter 57** states that, in their view and that of the Waipoua River Advisory committee, the rural stretch of the Waipoua River is performing its role of moving large quantities of water, more safely and efficiently now that in the past when the river was allowed to wander more 'naturally', under earlier engineering wisdom. This has protected river assets and private land from both public and private expense and markedly reduced the loss of land by erosion. The submitter

states this is primarily due to the sensible and responsible management by recent successive regional council initiatives supported by their local advisory committee. The submitter is concerned that the old idea of letting the river wander will only return to the failed and costly mistakes of the past. The acquiring of private land to form larger buffer zones, to allow the river to eat them away to a predetermined management line, before some repairs are done seems illogical as once the damage has occurred and the river remains free to wander, then repeat damage is a given, causing continued expense and public discontent. The submitter states that only regular work and maintenance on the river, including that of heavy equipment, can provide a safe and functioning environment.

### 3.3.3 Use natural systems to reduce flood risk

**Submitter 16** considers that any flood control work should focus, where possible and appropriate, on the use of natural systems to attenuate flood risk. The submitter considers that this should focus on the widening of the available flood plain/erodible river corridor, the use of wetlands to attenuate flood waters, and a reduction in the area of impervious surfaces in a catchment to promote groundwater recharge and reduce the intensity of flood peaks and adverse effects. In general, these sorts of management methods tend to cost less in the long term than engineering 'solutions' and provide a number of ecosystem services, including increasing the availability and quality of habitat for native species. GWRC should be doing all it can through its flood/river management to protect the habitat of threatened freshwater species.

**Submitter 16** would strongly support activities to widen erodible river corridors (being the area of floodplain available to the river) across Wellington provided adverse effects on the biodiversity values of any rivers are avoided during any river works. The submitter would support the acquisition of property along the river, including the acquisition and removal of residential homes or infrastructure located in areas that are flood prone, and to allow for a wider river corridor within which to the river will be able to move/flood. The submitter notes that acknowledging the risk of and planning for future natural hazards and disasters is extremely important given the potential effects of climate change. The submitter implores GWRC to take as much action as possible to minimise the contribution of the region to climate change, and thereby lessen the risk for what is a coastal and vulnerable region in many respects. They strongly suggest GWRC adopt a system of river management centred on the assessment and retention of 'natural character' and 'habitat quality' of rivers, such as the Natural Character Index (NCI) and the Habitat Quality Index (HQI). These were developed explicitly for managing rivers to maximise river health for native species and would be extremely beneficial in assisting council to sustainably manage rivers, and to meet its requirements for the protection and maintenance of biodiversity under the RMA, NPS-FM, RPS, NRP, and other guiding legislation.

**Submitter 30** stresses that rivers flooding is a natural process and it cannot be stopped, only managed as best as possible. The submitter is concerned with taking away an asset or resources from rivers, for example stop banks and strong healthy trees, only to replace these with another stop bank and more trees. The submitter believes this is wasting time and money replacing them when there is no need to remove them in the first place. The submitter stresses that the trees have a purpose and take many years to grow, so queries why Council is proposing mass destruction of the rivers and surroundings and that it is sad to see this occurring in the 21<sup>st</sup> century. The submitter has referred to an example of destruction of trees at Te Ore Ore Ruamahanga River at Gladstone Ruamahanga River section. The submitter notes that had maintenance of trees occurred, mass culling would not have been required.

**Submitter 30** urges Council not to widen any rivers as this is playing with fire and will lead to trouble when floods occur as it will have a ripple effect on damage to all life forms that live within

the river itself. The submitter is concerned about potential habitat and ecosystem and environmental effects. The submitter is concerned that mass gravel extraction affects water levels and flow which in turn affects the river bed banks and buffers for river edges and all life forms living in the river itself. The submitter is also concerned that the rock groynes are not effective and are not a good use of money, as well as not being able to swim through them. The submitter is highly concerned with the effect Council is having on the District's river environment.

### 3.3.4 Riparian planting and management of buffer areas

Many submitters (**Submitters 1, 14, 25, 37, 41, 47, 49, 50, 56, 57, 61**) raised issues of the riparian planting of buffer areas as a management approach – both support and opposition to the approach were expressed.

In terms of supporting comments, the following submission points were made:

**Submitter 14** highlights that the implication from not just this FMP but from other plans to come on the Ruamahanga (e.g. the Ruamahanga Whaitua and the forthcoming Eastern Hills one; from the Pukaha to Palliser (P2P) large landscape restoration project; and from the heralded National Policy Statement on Indigenous Biodiversity) that there is going to be a lot more plants needed and people to plant them, not to mention the fencing, spraying and site preparation, weeding, maintenance and, one would hope given the Government's Predator Free by 2050 goal, pest control also involved. The submitter requests that serious consideration of the potential in all of this to create new, meaningful, ongoing year-round jobs for the many in the community who are willing and need to work. Such an approach would provide significant social well-being benefits.

**Submitter 37** raises concerns with the river work carried out on the Waingawa River in the vicinity of the Hood Aerodrome, over the past ten years, specifically with the use of bulldozers. The submitter notes that this area has become increasingly ugly and that they enjoy walking along the river and find it disturbing to see the riverbed increasingly disfigured. The submitter notes that one of the pleasures and beauties of the river is the way it cascades from one set of rapids to another. The submitter is pleased to see in the plan the aim to reduce this kind of work and replace it with vegetative plantings of one sort or another. The submitter considers that the less bulldozers in the river the better which would be in accordance with the recreational and landscape values of the plan. The submitter is pleased to see the aim of increasing and monitoring the name of runs, ripples and pools along the Waingawa and other rivers. However, the submitter thinks this seems to be at odds with what is currently happening along the rivers with Fish and Game New Zealand saying the pools have destroyed by cross blading on the rivers.

**Submitter 37** notes that any works that destroy pools should be halted and they would like to see tree plantings carried out on private land beside the Waingawa River in the area around the Hood Aerodrome (on the opposite bank) to help stop erosion. The submitter notes that unlike on the aerodrome side of the bank where willows have been planted, there is almost no room between the bank and private property and they believe this should also happen at similar spots along the river. The submitter would like to see the practice of cross blading along the rivers ceased because of the damage to the habitat of life forms within the rivers. The submitter notes that last spring there were high flows along the Ruamahanga River at exactly the same time as elvers would have been making their way up the river from the ocean.

**Submitter 47** would like to see a faster flowing river with a hard bed, riparian planted where practical and free of Crack Willow – this will make a big impression on sediment loading. The

submitter urges more consideration of the Whangaehu River in the FMP and an increase in monetary grants to enable this to happen. Assistance needs to be in the form of both an increase in monetary grants but also access to those who have expertise in willow removal. The submitter would welcome discussion and on-farm inspection.

**Submitter 56** supports in principle the riparian planting of buffers within the western rivers and vegetated edge protection within the eastern rivers, but seeks to ensure the council and its contractors are aware of the need to ensure safe separation distances are maintained between overhead electricity lines and vegetation in order to avoid public safety risk. The submitter seeks that the FMP acknowledges the need to ensure any riparian planting in close proximity to electricity infrastructure is of appropriate low growing species or set back a sufficient distance to ensure no conflict arises between vegetation and electricity assets. The submitter seeks an additional bullet point in Section 3.2.5 of the FMP in the paragraph which identifies risks as follows:

- *“The need to ensure riparian vegetation planted near electric lines is selected or managed to ensure it will not result in that vegetation breaching the Electricity (Hazards from Trees) Regulations 2003. To discuss works, including tree planting, near any electrical line, contact the line operator.”*

**Submitter 61** supports the extended use of planted riparian margins in managing flood hazards. The submitter agrees with the analysis of the benefits and risks associated with wider riparian areas.

In terms of opposing comments, the following submission points were made:

**Submitter 1** states that the planting of buffer zones will not work and will be a waste of time and money. In the submitter’s experience of living next to the river for 30 years, large swathes of willow and regrowth can be taken out in just one event. The submitter also states that the idea of letting wetlands develop (particularly in their reach of the Waingawa<sup>3</sup>) is a pipe dream as the submitter has tried to develop these on their private land beside the river but it has not worked because the composition of gravel and top soil will not hold water.

**Submitter 25** suggests that there appears to be no recognition that native planting will increase substantially as a result of other policy changes by GWRC and the possibilities of integrating all of these changes to create scale etc. The submitter notes that instead Flood Protection have created two additional staff members to deliver riparian planting. The submitter notes that GWRC are requiring the wider community to fund the purchase of plants and then to volunteer to plant them which is overkill.

**Submitter 41** considers that control of introduced wildlife is key to preventing flooding so understorey growth can re-grow and the peak of any flood waters are slowed down and soaked up before they cause river flooding. Spending on fixing the problem without any measures of prevention would be a misuse of public spending.

**Submitter 49** is concerned that buffer zones will collect logs and debris and large amounts of silt, and this silt and debris will lead to a narrower river, faster running water, bank erosion and an uncontrollable river. Water flows easily over pastures, but not over buffer zones.

**Submitter 50** questions whether there is sufficient support for the science around habitat diversity confirming that the level of benefit will justify the level of loss impacts that this shift in management practice will have on landowners. The submitter states that they do not understand the benefits and would be keen to listen to the perceived benefits.

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<sup>3</sup> From the submitter’s contact details, this appears to be Waingawa Reach 16 - Upper Plains

**Submitter 57** is concerned about the nature of the buffer plantings (in relation to the rural Waipoua River) which in concept has a good environmental feel, but the reality at high water flows and flood times will be deposits of debris and rubbish, and dead and rotting vegetation will deposit itself among the buffer zone plantings causing an ugly, smelling, rodent infested environment. It could also be seen as an excellent place to dump domestic rubbish (as can be seen along the river edge plantings of some Hawkes Bay rivers), and who will bear the time and cost of the clean up?

### 3.3.5 Increased need for pest and weed control in planted buffer areas

Many submitters (**Submitters 8, 9, 11, 14, 19, 21, 25, 47, 49, 61**) raised issues in terms of the planted buffer approach with most considering this approach will create more invasive weed and animal pest issues on river margin areas which will be difficult and expensive to control.

**Submitter 8** expresses concern about the control of invasive/noxious weeds and questioned who will be responsible for paying for the control of weeds if a buffer zone increases the river margins (i.e. this should not be at the expense of private land owners).

**Submitter 9** expresses concern that fencing off areas will result in an infestation of weeds (like blackberry and old mans beard) and will create a haven for rabbits, possums, rats, stoats and ferrets, which will be difficult and expensive to control.

**Submitter 11** expresses concern that GWRC is passing the cost and responsibility of plant, predator and weed control in buffer strips back to the landowner after 2 years. In the submitter's experience of 40 years of buffer strip maintenance, the problem has never been greater and more difficult to control than now. The haven created by the buffer zone for predators and pest has caused an explosion in the feral cat population and ferrets, stoats and weasels. Vines are growing 10m up in canopy of trees, stifling trees, killing young plantings, encroaching over fence lines into pastoral areas, creating a haven and corridor for predators and pests, and along with blackberry and the like making access extremely difficult. The submitter says that GWRC efforts in the past have been sporadic and if left to landowners control would be inconsistent because they are pressured for time and money. It takes the submitter about 4 days to spray their buffer zone each year, they are continually inspecting bait stations and trapping, and are making no progress. The submitter suggests that funding for planting predator, pest, weed and planting should be rated for. The submitter states that these buffer strips are in effect land that can no longer be farmed and questions why the costs and responsibility should rest on the landowner. The submitter also states that managed stocking should be catered for, not total stock exclusion, to help control weeds and open up buffer strips for access.

**Submitter 14** notes the potential local job creation opportunities in terms of the planting, fencing, spraying, site preparation, weeding and maintenance that will be required.

**Submitter 19** queries who will be in charge of weeds within the buffer area and whether the responsible party will cover the cost of them.

**Submitter 21** has concerns with the buffer zones leaving the river banks overrun with gorse and blackberry.

**Submitter 25** notes that there is strong support for the development of wider buffer zones interplanted with natives and wider river channel. However, the submitter raises that there are a number of unanswered questions which need further research i.e. there is no analysis of the likely impact of "sawfly" on willows if the conditions become hotter. The submitter believes it is unlikely that "pests" will be removed within 5 years and that spraying on the margins of

waterways has become a contentious issue and the chemical glyphosate may become restricted over time. The submitter suggests that a wider channel will result in increase numbers of plant and animal pests on both the buffer zone and the river channel floor requiring continual clearance especially to protect the nesting habitat of the threatened birds who nest on the river bed.

**Submitter 47** raises concerns about the need for eradication of existing Crack Willow on river margins. They state that assets such as roads and electricity are becoming increasingly threatened by the river caused mainly by the Crack Willow which is fouling power lines and spreading wider, undermining the road and creating slumps in places. Not only are council and other service assets at risk but the submitter's own infrastructure is coming under more pressure.

**Submitter 49** is not convinced that getting volunteer groups to fence, plant and spray weeds on this land is practicable knowing that the river could wipe out the plantings and work undertaken. Buffer zones will grow fescue that is waist deep.

**Submitter 61** supports the riparian approach but is concerned with the plan to pass the costs of and responsibilities of pest management within the buffers to landowners after only two years of planting. The submitter believes the costs and responsibility of pest management along buffer strips should be shared between GWRC and catchment groups on an ongoing basis. The submitter believes that ongoing sharing of the costs and responsibilities for the management of pests would reflect the benefits these areas which will be wider than adjacent landowners. In addition, if the submitter believes that if responsibility is left just to landowners, the controls are likely to be inconsistent along the strips which will impact on the effectiveness of adjacent pest control efforts.

### 3.3.6 Infrastructure within buffer areas – costs of installation, addressing flood damage and who pays

Two submitters raised particular issues in terms of impacts of the buffer management approach on infrastructure located within buffer areas. [Note: Submitter 56 raised specific concerns in relation to electricity infrastructure impacted by the FMP which are covered under heading 3.10.4 below]

Related to their concerns about the buffer approach, **Submitter 9** considers that if the intention is to increase capacity of the river to cope with a high flood situation, it will be necessary to widen the river in the area of both the road and rail bridges which will be extremely expensive.

**Submitter 19** has questioned whether GWRC will be required access to their land to install the groyne. The submitter has also raised that they want to help the river but cannot afford anything to go towards the installation. The submitter has also queried when the installation of the groyne will begin.

### 3.3.7 Management of river characteristics

**Submitter 25** suggests that the paper by Professor Death is confusing, mixing benefits between streams and rivers. For example, buffer zone shading is highlighted yet rivers are to more naturally meander then the channel will be criss-crossing the river bed-a hot bed of rock during summer and so a greater extent of the river channel will be out of the influence of the buffer zone. The submitter notes that they believe a critical factor in reducing the water temperature in summer is the number of pools – deep pools receive underflow which is a consistent

temperature throughout the year. The submitter is concerned that the upper stretches of the rivers are degrading and they are concerned about sacrificial buffers in degraded sections of the river edge. The submitter suggests that if the river channel is not shifted, river edge erosion will continue unabated, and the proposed benefits of the management approach will not be achieved.

**Submitter 54** states that a definition of natural character with respect to the river body should also be included as follows:

*“The combination of landscape, morphological, hydrological, ecological features on a floodplain that would be present with minimal human intervention.”*

**Submitter 54** states that the best Code of Practice to be referenced is that developed for the western rivers consents which must be followed through with in these eastern rivers.

### 3.4 Stopbanks and other structural responses

Alongside their opposition to the buffer approach, **Submitter 15** suggests that armoured protection is put in place for their property which is located on the Waingawa immediately downstream of the rail bridge and State Highway 2 road bridge. Because of the river design work to protect the bridges, their property gets hammered. The submitter is willing to discuss this further if required.

**Submitter 19** queries how the proposed rock groynes will affect their property price value. The submitter notes that their property already is bounded by the river and this raises a question as to whether the groynes will affect their boundary, and if so, how?

### 3.5 Gravel extraction as a river management method

Another theme raised by several submitters (**Submitters 6, 11, 20, 54, 61**) was the role of gravel extraction as a river management method. In general, these submitters consider gravel extraction to be an important river management method that should be continued under the FMP's overall management approach.

**Submitter 6** supports the FMP but wants to ensure metal extraction continues to be used as a way to keep the river within its boundaries.

**Submitter 11** opposes the FMP and considers gravel extraction is an integral part of river management and maintaining a viable extraction industry is critical.

**Submitter 20** highlights that near Candy's and the aerodrome, 3 gravel extractors are in close proximity and under proposed specs gravel can be taken from the centre to form a groin. The submitter queries GWRC's yearly allowance for gravel takes, stating that they fail to see the relationship between the flood volume and annual gravel takes.

**Submitter 54** states that private gravel consents are an unquantifiable risk to the FMP, and as a result, the location, timing, quantity, expiry date and potential for review of these consents needs to be determined and listed.

**Submitter 61** strongly supports the continued use of gravel extraction as a tool to manage flood risks. The submitter supports the increased monitoring proposed under the FMP and the targeted approach to gravel extraction. Maintaining a viable extraction industry is critical to the sustainability of this management tool and the submitter encourages GWRC to work with the sector to ensure businesses remain viable.

### 3.6 Recreational activities, uses and public access

A number of submitters (**Submitters 1, 13, 15, 19, 33, 54, 61**) made comments in relation to recreational activities and public access associated with the river margins and the buffer management approach (and enhancement opportunities) proposed by the FMP. Most submitters consider the buffer approach important for supporting and strengthening recreational uses and public access to and along rivers. However, several submitters expressed concern and were opposed to recreational activity and public access.

In terms of supporting comments, the following submission points were made:

**Submitter 13** seeks the construction of a pedestrian swing bridge crossing the river next to the rail bridge crossing behind the Equippers Church to complete the walking circuit on the river banks.

**Submitter 33** requests that if GWRC does go ahead with work on the Waipoua river, that they include better public access to the Oxford Street side of the river. The submitter requests this include walking tracks similar to the other side, and pedestrian bridge over the river by the train tracks (as this has already been suggested by council). The submitter believes that this would be a fantastic way to enable people to enjoy and care for the river. The submitter suggests that the bridge would improve access for Oxford Street residents to the West side of town. They would love for their children to be able to bike to school without having to navigate the very busy traffic around Opaki Road and the main roundabout by the swimming pool. The submitter also thanks council for the new bike lane going north of the Waipoua bridge, which they think is great.

**Submitter 54** states that it is not clear how public access will be incorporated into river design and this needs to be made explicit.

**Submitter 54** also states that it is unclear what happens to accreted land and that the FMP should set in place a process by which this land becomes local purpose reserve or similar. This would enable the regional council to have greater control of the buffer corridor – either to allow for less active erosion management or to provide for the greater buffers as specified in the plan. The submitter states that this process must include making any claims over accreted land publicly visible and ensuring public interest and maintaining public access is of high priority, as well as GWRC acquiring the land through official processes, including LINZ processes for local purpose reserves.

**Submitter 54** states that the council should develop a process for determining *ad media filum* rights to the centreline of the river and identify which land titles these rights exist on in the process of obtaining other permissions and working on the river. This can be used to update 'hydro' layers published by LINZ (which are often used to assume public land and therefore access).

**Submitter 61** believes there is an opportunity to incorporate a future trails network as part of the wider buffer areas along rivers, and subject to community feedback, will be investigating a trail linking Gladstone and Daikins Road over the next year which will have a good synergy with a buffer along the Ruamahanga River.

**Submitter 61** also notes that Carters Reserve is identified in the FMP as an area that could be enhanced by the management approach – including GWRC continuing to support the Carters Reserve Care Group to enhance the reserve and promote its use. The submitter strongly supports this approach.

In terms of opposing comments, the following submission points were made:

In conjunction with their opposition to the buffer management approach, **Submitter 1** states that there is very little recreational activity on their particular reach of the Waingawa<sup>4</sup> as there is only access of the end of Skeets Road and it is very rough terrain.

**Submitter 15** opposes the idea of a walking/cycling trail along this portion of the river (downstream of the rail bridge and the State Highway 2 road bridge) due to the industrial/commercial use of our property and the close proximity to heavy tracked vehicles and frequent truck movements involved in river metal extraction and crushing plant. The idea of mixed pedestrian traffic with this type of operation is nonsensical and the idea cannot be supported for very real and obvious health and safety reasons. The submitter's suggestion is to start any planned trail further east along the river, or if necessary, on the southern river bank.

**Submitter 19** has queried how they are meant to stop the public utilising the groynes to access their property.

### 3.7 Environmental Enhancement

There was mixed support for environment enhancement for two submitters.

**Submitter 54** states that the section related to the Environmental Enhancement Fund should be deleted. Whilst the purpose of it appears positive, it does not relate well to the rest of the likely future consent and may undermine the new FMP philosophy by assuming all issues and damage can be mitigated by money, rather than avoided entirely. It also does not sit well with the structures and funding for environmental enhancement that will come from future resource consents.

**Submitter 61** strongly supports the creation of the Riparian Management Officer position. Promoting good riparian management practices and providing information to groups and individuals will be an important part of the success of this new approach to river management.

**Submitter 61** also strongly commends the plan's recognition of the role of care groups and clubs in the implementation of the FMP. The submitter encourages GWRC to utilise and support all volunteer groups to participate in activities, especially in riparian management activities.

### 3.8 Climate change and flood risk

Two submitters questioned the implications of climate change to flood risk.

**Submitter 34** notes that they have records that show the first ranked flood – '98' was the highest flood since 1897 i.e. 122 years and although the submitter has been told that NIWA call it a one in one hundred year flood, the submitter awaits the independent audit comment. The submitter stresses that as a community they should be able to determine the risk factor and Greytown has decided to use 10% climate change addition. The submitter details that the chief GWRC climate change scientist states that nobody knows if it is going to warm or cool in this period of uncertainty. The submitter notes that as a collective it may be chosen to be conservative, but that the public need informed debate.

**Submitter 35** suggests that the TKURFMP, like the WFMP before the process was taken over by the grass roots, bottom up, community driven group known as the Waiohine Action Group (WAG), has accepted catastrophist climate change predictions in its flood modelling. The submitter states that these climate change predictions are based on the deliberately misnamed

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<sup>4</sup> From the submitter's contact details, this appears to be Waingawa Reach 16 - Upper Plains

“business as usual” emissions pathway (RCP 8.5) and have led to flood hazard maps that are completely out of touch with reason or reality. The submitter stresses that these overstated flood maps will lead to proposals for flood management that are excessively costly and intrusive to the flood plain. The submitter notes that for the WFMP, a less aggressive climate model based on RCP4.5 or RCP6 would probably produce a more realistic plan. The submitter suggests that GWRC must consider putting a stop to the current approach to the TKURFMP and restarting the process with appropriate climate modelling.

### 3.9 Removal of specific properties from the FMP

**Submitter 52** states that they have had personal observation of the river for the last 70 years and there is no need for their property to be considered within the floodplain considerations. The submitter’s property bounds the Ruamahanga River at Te Ore Ore and also Te Ore Ore Road, and is on tow terraces between the river and Gordon Street. The submitter has recently had a survey completed which disproved the possibility of an earthquake fault in or near the property. Although there may have been historical times when the river intruded into the property, the mining of the river by the Masterton County Council and other works within the bed of the river have lowered the bed to a position where there is no threat to flooding on the submitter’s property.

### 3.10 The proposed implementation approach for Te Kāuru

#### 3.10.1 Costs of implementing the FMP and who pays

A number of submitters (**Submitters 14, 15, 18, 21, 24, 25, 30, 34, 35, 61**) raised issues in terms of the cost of implementing the FMP, and many raised questions about who would pay for the proposals. Most submitters were opposed in some way to the funding proposals, however there were also some supporting comments.

In terms of supporting comments, the following submission points were made:

In conjunction with their broad support of the FMP, **Submitter 14** supports a wider sharing of costs to include the wider community not directly affected by the river’s actions in recognition of the public good considerations now encompassed in the FMP, but the submitter is also aware that the fairness of the specific allocation of costs is being challenged. The submitter hopes that costs can be equitably resolved to everyone’s satisfaction.

**Submitter 61** supports the proposed funding model that GWRC has presented but would like to emphasise the importance that ratepayer consultation plays in any decisions made in the future.

In terms of opposing comments, several submissions raised the following points:

**Submitter 15** does not support the proposed funding model where river works are funded by the entire rating base. This will allow GWRC to rate directly all properties for future river works programmes rather than the few who directly benefit. For example, the submitter is agreeable to paying their share for direct river protection works and management of the portion of the Waingawa River as it relates to their property. The submitter’s property will never be flooded by the Waipoua or Ruamahunga Rivers so therefore strongly object to having to pay any share of works for these rivers. Likewise, the submitter does not expect farmers on the Ruamahanga River to fund works for the Waingawa. The submitter instead suggests keeping the existing

funding model with the data that shows the percentage of each property that directly benefits, as is currently used, but allows for increased funding to support necessary works.

In addition, **Submitter 15** does not believe that GWRC has informed all ratepayers sufficiently that GW propose a fundamental change in the way river works programmes are funded. The submitter accepts that there has been data in the newspaper, and representation at car boot sales, and farmers market, along with a BBQ on the Waipoua River bank, however all of these are extremely limited in the scope of true and effective consultation. GWRC should have used the opportunity to include an informative newsletter in with TA rates invoices to reach all ratepayers. As an example, someone who lives at Castlepoint would have no idea that they are about to pay for a portion of multimillion-dollar river works on the Waipoua River on an ongoing basis. The submitter suggests that GWRC conduct real consultation by including a dedicated insert in with the May 2019 rates notices to inform all ratepayers, and deadlines for submissions on the FMP should be pushed out to allow for this to take place.

**Submitter 18** believes better information is needed on the funding of the scheme and those that are not in the scheme should not have to pay for it.

**Submitter 21** states that as land owners adjoining river, they are already paying rates. The submitter queries how the costs are going to be spread over the wider community and whether this will be through paying more rates.

**Submitter 24** believes that there has been no consideration of the impact on Carterton District Council or South Wairarapa District Council and that the proposed costings make no sense at all.

**Submitter 25** is concerned with the economics of the process, providing the example of the Wangawa river scheme, which is used to demonstrate the funding. The targeted rate which currently is fully funded by river scheme taxpayers totals 28% of the funds. The submitter notes that the introduction of capital value rating will see the current river scheme ratepayers contributions to flood protection fall from the above 28% to 4-5% which is a substantial drop. The submitter states that there is no detailed analysis presented to justify this rates grab by the Flood Protection Department and the prime beneficiary of the river schemes are the existing ratepayers not the wider community. The submitter states that all of the major projects identified to date are for Masterton District Council and therefore the wider community will again be hit by increased costs. The submitter requires full disclosure of the funding requirements to ratepayers.

**Submitter 25** notes that they are further investigating the Kāpiti Coast District Council district, as an actual example of such a rating methodology. The submitter notes that they will report the results of this investigation in due course. The submitter believes that the figures including the \$5M to purchase buffer zone land for development appear to come from nowhere. The submitter notes that a key element in the success of river scheme management in the Wairarapa has been the fact that such schemes have operated as a partnership based on mutual respect of the parties – e.g. the landowners and the council. The submitter notes that land purchases in the Wairarapa have not been the norm. The submitter also identified that the consultation undertaken to date does not align with the special consultative processes required to introduce such a major change in rating.

**Submitter 30** is concerned around costs and money being spent by Council listing other projects including hood aerodrome and Rathkeale College. The submitter wants to whether the proposed cost will actually add up.

**Submitter 34** requests that Council stop spending anymore more money on the lower Waipoua section (Mahunga to the end of the river) until the independent audit is completed and the public

have learnt the truth. The submitter notes that the common response from the people from Oxford Street, that the submitter has met with (about 60 people) believe GWRC have an agenda – that GWRC need a substantial capital works programme, to borrow against for their funding model. The submitter further that the people they have spoken with, think the model is overcooked and crazy.

**Submitter 35** states that the FMP mentions many totals for the costs of the work, but the widely divergent amounts used in the FMP suggests that costs are not understood and have not been subject to any analytical rigour. The submitter states that the FMP suggests a substantial change to the way the FMP is funded and how it is rated to the various ratepayers in the catchment. The submitter considers that the FMP does not meet the test of the “special consultative procedure” necessary to make such a change to the funding model.

**Submitter 35** notes that TKURFMP outlines in several places some of the significant costs associated with the flood management responses but there is no place in the plan where all the costs are assembled, there are wide discrepancies between the various cost figures, and there is no evidence of any analysis of those costs or the uncertainties associated with them. The submitter details that the table described as High Priority Response Projects or Major Project Responses totals \$3,685,000 in capital expenditure yet section 4.3.5 on page 34 says the total cost is \$12,000,000. On page 142 there is a table that totals \$16,950,000. The submitter stresses that this is not split into capital and operating costs but appears primarily capital expenditure. The submitter notes that the footer of this table says that the total forecast cost \$8 million with no explanation for a nearly \$9 million discrepancy.

**Submitter 35** also notes that costs in the plan ranges from \$3.7 million to \$8 million to \$12 million to \$16.95 million and these are not rounding differences but show the plan does not show how much it will cost. The submitter details that this coupled with the vagueness of who is going to be rated pay for these widely divergent sums of money, the TKURFMP is inadequate and reflects badly on both GWRC and the TKURFMP Plan Subcommittee. The submitter suggests the timing of the costs is equally vague and GWRC must consider postponing hearings on TKURFMP until competent financial analysis has been applied to the costs of the scheme and those costs have been time sequenced, tabulated and reconciled so that the likely costs are transparently disclosed.

**Submitter 35** stresses that there are significant costs associated with the flood management responses in the TKURFMP and that rather than addressing these costs and impact on direct beneficiaries of the expenditure, the plan proposes a new funding structure. The submitter notes that this will spread the costs over, any indirectly involved ratepayers by eliminating the targeted portion of the rates and replacing it with a catchment wide rate. The submitter believes this is avoiding hard conversations over land use changes rather than real analysis of vague suggestions of wider benefits.

The submitter also stresses that the impact of funding changes on rates in Masterton and Carterton Districts have only been subjected to cursory analysis and have not been canvassed explicitly with the Districts’ ratepayers. The submitter notes the lack of explicit consultation the assertion of “consultation” meets the test of the “special consultative procedure” necessary to make such a change to funding model is not correct (reference to page 142). The submitter notes that the forecast total appears \$9 million different from the table it sits under, the \$7/\$100,000 is based on a figure (\$8,000,000) that is not explained and only the rates impact considered in Masterton when the TKURFMP straddles both Masterton and Carterton Districts (Section 4.3.4 is referenced). The submitter raises concerns regarding confusion over catchment wide rates impact from the capital spend being \$7/\$100,000 or \$4.8/\$100,000 or another number such as \$20/\$100,000 implied by the table on page 142 and when added to

operational rates \$44/\$100,000. The submitter seeks TKURFMP be postponed until further robust cost analysis is done.

### 3.10.2 Governance structure and processes, advisory committees, community involvement and conflict management

Many submitters (**Submitters 14, 18, 21, 54, 57, 61**) raised issues in relation to the FMP's implementation approach, including the proposed governance structure and processes, the use of advisory committees and suggestions for committee membership, conflict management.

In terms of supporting comments, the following submission points were made:

**Submitter 57** states that in relation to the governance structure, the retention of the individual River Advisory Committee, feeding into a larger management body appears to be sound as the Waipoua Advisory Committee has often stated that it sees this river as unique with features distinct from the larger rivers in the area and needs a specific Advisory arm.

**Submitter 61** supports the proposed governance structure and welcomes the opportunity to participate directly as part of an Upper Ruamahanga River Management Advisory Committee.

In terms of opposing comments or comments seeking changes, the following submission points were made:

**Submitter 14** suggests that in recognition of the spreading of costs of the FMP across the wider community, that it would be appropriate for those environmental interests to be formally represented by appointment to not only the Advisory Committee but also arguably the eight existing river scheme committees. Whether that be by people from Wairarapa Forest & Bird, Sustainable Wairarapa Inc or other mechanism/procedure is a second consideration.

**Submitter 18** supports any community initiative to improve floodplain management or a model similar to one on Waiohine River (WAG). The submitter highlights that there is an existing group which has started up "Pukaha to Palliser". The submitter believes this will have a great influence on the future of the river/streams/creeks/ spring, buffer zone and riparian margin/ planting.

**Submitter 20** identifies that GWRC have a set of expectations (specifications) from "interested parties". The submitter notes that each interested party has demanded what each one expects how the rivers are to perform (iwi, fish and game, and recreational users) and it appears that Council have adopted their specifications when considering river management. The submitter queries the influence of people who boarder the river and pay the rates and who are the ones who would be most affected by floods that may come along. The submitter has suggested that it would be beneficial to include these parties with the interested parties.

**Submitter 21** suggests that Interest Groups involved in promoting this plan seem to have more influence on what happens to the lands that are neighbouring the rivers despite most of the time these groups' members do not live on the river or within the district.

**Submitter 54** would like to see a more streamlined process for governance. The current governance structure has increasing perceptions of conflicts of interest and does not encourage active participation by key statutory agencies like Fish and Game and DOC as well as iwi. There are too many committees – the governance can be streamlined by way of a statutory agencies/iwi partnership group.

**Submitter 54** states that a section on community engagement/acceptance and conflict management needs to be inserted into the FMP. Allowing the river more room to move will not happen without a substantial community engagement programme. Where there is a conflict of

views, the FMP must be clear on a hierarchy of values to enable the regional council to remain firm.

### 3.10.3 Impacts of Te Kāuru on Carterton and South Wairarapa Districts

**Submitter 29** raises that the Plan is Masterton centric of necessity, but it does not consider the impacts on South Wairarapa or Carterton District in any way. The submitter notes that they have verbalised the same 'downstream' concerns when attending the RC hearing for Masterton's waste-water a decade ago: impact on Wairarapa Moana etc.

**Submitter 35** notes that TKURFMP affects both Masterton and Carterton District because the Te Kāuru Upper Ruamahanga catchment is defined to encompass the upper reaches of the Ruamahanga River to the Waiohine confluence. The submitter stresses that whilst the Plan needs to be Masterton centric by necessity, the impact on Carterton, both from a flood plan management perspective and ratings perspective, has been largely ignored with the TKURFMP being silent on Carterton impacts. The submitter suggests GWRC must consider putting a stop to the current approach until impacts on Carterton from a rating perspective in particular have been considered in more depth. The submitter also states that the impact on South Wairarapa from a flood management perspective has been completely ignored with the TKURFMP being silent on impacts south of the Waiohine confluence. The submitter urges the GWRC to consider putting a stop on their current approach until the impacts on the South Wairarapa from a flood management perspective have been considered in more depth.

### 3.10.4 Impacts of proposals on specific electricity infrastructure

**Submitter 56** states that the reference to an electricity pole in the active channel of the river bed (see pages 154 and 156) in the Waingawa River Upper Plains – Reach 16 needs to be amended (on page 154) to clarify that it is an electricity support pole and not a pylon. The submitter states that there has not been any formal approach from the Council regarding relocation of the pole and notes that there are a number of considerations involved in any such relocation. The submitter would however be willing to discuss the feasibility or otherwise of relocating the pole and suggests that Council contacts its approved Major Works Contractors in the Wairarapa (details of which are noted in the submission).

**Submitter 56** notes that the FMP identifies a Major Project Response being the assessment of the Homebush Waste Water Treatment Plant to flooding and implementing appropriate mitigation / resilience measures. This includes potentially elevating the plinth for the generator and raising electrical devices above flood levels. However it is not clear whether such electrical works will affect Powerco assets, which deliver electricity to the Homebush WWTP. The submitter suggests that if Council wishes to pursue works that affect or require changes to Powerco assets, it will need to contact its approved Major Works Contractors in the Wairarapa (details of which are noted in the submission).

## 3.11 Te Kāuru monitoring requirements

**Submitter 54** states that the FMP is deficient in terms of outlining dates and timeframes by which critical monitoring work must be undertaken. For example, there is no hard commitment to re-examining river cross-sections and profiles to determine the current morphological character and capacity of the river channel – these were done in 1991 and must be redone with urgency. Without an up-to-date understanding of the river system, all works are guesswork.

Recalibrating the AEP flood levels would provide a review and validation of river design principles and operational actions. The submitter also states that the monitoring section needs revision to ensure there is a clear cycle between:

- a. Objectives for the river (as expressed in the submission)
- b. Design that gives effect to those objectives
- c. Regular monitoring of the river to ensure that the design is met
- d. Reincorporation of the outcomes of monitoring into the design through adaptive management principles.

### 3.12 Concerns related to the Te Kāuru development process

Many submitters raised specific issues related to the process of developing the Te Kāuru FMP including concerns about its underpinning information evidence base. These are summarised below.

#### 3.12.1 Issues with the overall Te Kāuru development process, project team, level of community involvement

Several submitters (**Submitters 11, 23, 24, 25, 26, 35, 42, 58**) raised issues related to the overall process used to develop the Te Kāuru FMP and provided many suggestions for improvements with examples of other models they consider relevant and successful.

**Submitter 11** questions why the Te Kāuru project team did not include some detractors, especially those that could challenge GWRC officers as this is what the Waiohine Project team had and we had lively debates with divergent opinions, but decisions made by consensus. The diversity of the project team has given the community confidence.

**Submitters 23, 26 and 42** suggest that the proposal should include a 'Community-led river plan process' with a Project Team of local people following that of the Waiohine Action Group and the Mangatarere Restoration Society.

**Submitter 24** suggests that the exercise should be revisited in line with the WAG model and the Mangatarere Flood Plain Management Plan (MFMP) which is starting down the grass roots, bottom up, community driven path and will deliver deep and sustainable community involvement.

**Submitter 25** highlights that they are impressed by the outputs of the community driven process (Waiohine Action Group-WAG) currently underway on the Waiohine River and recently initiated on the Mangatarere river system. The submitter strongly supports the community driven model and believes such a process needs to be initiated to develop and appropriate Te Kāuru Flood Plain Management Plan. The submitter noted recent publicity by Chris Laidlaw ("we've taken on board the approach of working this through with the community before you begin to do any design work" Dom Post April 5) and Adrienne Staples lauding the community driven process as the future of Flood Protection practices.

**Submitter 25** suggests that given there are two areas without flood plain management plans – Te Kāuru and Lower Wairarapa Valley Development Scheme – that such a process needs to be commenced immediately for the Te Kāuru project. The submitter highlights that there are strong similarities between the collapse of the Waiohine river project and the Te Kāuru as follows:

- Flawed modelling data resulting in the creation of huge flooding footprint.

- Climate change factor over estimated.
- A poor understanding of how our rivers move in floods, i.e. significant bed movement resulting in the channel volumes increasing during significant flood events.
- Inadequate research into existing flood data within GW's files eg the data collected after the 1998 floods.
- An inability to accept observations noted during major floods.
- Refusal to include historical data despite such practices in methodologies such as the US Geological Survey.
- Inflated cost estimates which the community cannot afford eg a budget item of \$5M to purchase land for buffer zones.
- Inappropriate funding mechanisms to raise the necessary funds via a targeted rate..
- A top down approach controlled by flood protection staff.

**Submitter 25** highlights that the WAG project team has now taken control of all aspects of the management of flood management of the Waiohine River and are currently obtaining independent advice on the impact of current practices. The submitter believes this community drive approach is required to better direct flood plain management in the Te Kāuru catchments.

**Submitter 25** also suggests that there are numerous questions about the environmental outputs from such a concept which warrant further discussion with the wider community and the wider community needs to decide what and how the river should be managed not a group focused solely on flood risk. The submitter believes the management structure proposed precludes this happening with no positions available for the community despite the wider community paying the majority of the costs. The submitter suggests that an imbalance in funds generated by the targeted rate the wider community should be the majority on any management structure.

**Submitter 25** has noted that a strong social thesis within the document is that “the community is demanding wider river channels then they must pay”. The submitter believes such a thesis is untenable for two reasons:

1. The RMA places requirements on resource consent holders including the natural character/naturalness of rivers. River Management schemes need to achieve these requirements. If currently the river is deficient in some aspect then that is a direct result of the current and past practices of the schemes, then the schemes need to repair the damage they have created.
2. The submitter has shared the technical paper River Natural Character – natural character guidelines of the management of gravel bed river in New Zealand by Gary Williams April 2017 and provides an extract (inserted in submission). The submitter believes this extract supports the approach being considered by the review but it is instructive to record the what is proposed is not an impost on the river ratepayers rather it's the most cost effective in the longer term. Thus the submitter believes the central thesis that the community must pay is false.

**Submitter 25** recognises the social benefits of river systems and notes that this is why they support a community drive model to create outcomes that they desire and are prepared to fund. The submitter notes that the social benefits claimed in the report are overblown and lack objective analysis. The submitter notes that there is no analysis of the vulnerability of the bridge network within the catchment which has a potentially big impact on the social network within the plan area.

**Submitter 35** suggests that the proposed FMP is an outdated response to the needs for floodplain management in the Te Kāuru Upper Ruamahanga catchment. The submitter

considers it outdated in the sense that it is based on a top down model where 'the good and the great' decide and hand down a plan as 'pearls before swine'. The TKURFMP contends that it has been prepared as a living document and when it will need to be updated in the future, all of the interested stakeholders will be consulted to provide input into the long-term management of the river catchment. The submitter states that given there is no enduring community involvement in the TKURFMP, this seems a hollow claim. The submitter notes that this can be contrasted with the Waiohine Flood Management Plan (WFMP) which is truly a grass roots, bottom up, community driven response and the Mangatarere Flood Plain Management Plan (MFMP) which is starting down the grass roots, bottom up, community driven path and will deliver deep and sustainable community involvement. The submitter further notes that GWRC has lauded the efforts of the community involvement in the WFMP and have endorsed this approach with the MFMP. The submitter suggests that GWRC must consider putting a stop to the current approach to TKURFMP and restarting the process with a genuine grass roots, bottom up, community driven process.

**Submitter 58** outlines a number of concerns about the overall process including, its internal/external focus, costings, community understanding of the implications of the project, the open ended-ness of the outcome / costs, overall community input, the rumour that a peer review of the model is due mid to late this year and yet this is showing as a 'done deal', rigorousness of analytical review overall not just the modelling, and the overall procurement process.

### 3.12.2 Issues with the FMP submissions process, short timeframes, and lack of information

Several submitters raised concerns about the FMP submissions process and the perceived short timeframe for making submissions.

**Submitter 15** suggests that GWRC has not done enough to inform property owners on the river banks of what specific works are proposed for their properties. To point owners to a variety of lengthy online documents is not the same as sending individually tailored data clearly detailing what design approach is intended, and how this will happen in terms of land purchase etc. The submitter suggests that tailored letters are sent to owners of river bank land showing exactly what is proposed, explaining any options, and what powers GWRC will use to enforce change etc.

**Submitter 18** raises concerns with the submission process, noting that it was too short and that there was a lack of information or data, with better information needed on the funding of the scheme.

**Submitter 20** raises concerns with consultation with people who boarder the river and pay the rates and who are most affected by floods in terms of development of specifications compared to 'interested parties'.

**Submitter 60** states that they have had no direct alert of the proposed Te Kāuru FMP and it has only just come to their notice (on the date of their submission 16 April 2019). The submitter sees a number of issues with the plan and opposes it in its current form. They state that they will need more time to evaluate the plan properly, and they also understand that more work is being done on the plan which will not be completed for some time. The submitter requests that the hearing is delayed until the work has been completed.

### 3.12.3 Issues with the quality of the information/evidence base

Related to the concerns expressed about the submissions process and timeframes (see above), some submitters raised general concerns about the quality of information/evidence base that the FMP relies on.

**Submitter 20** queries whether Council conducts drone LiDAR surveys, and if so, whether Council has a good handle on where the “islands” are that need addressing.

**Submitter 30** queries why no photos showing Masterton’s flooding experiences over the last 20 years have not been included and only projections are included. The submitter wants proof of works before and after completion.

**Submitter 34** considers that due to the incompetent processes that GWRC have employed in the last four years, a new system of managing flooding risk needs to be employed, similar to Greytown. The submitter notes that senior GWRC’s engineers say that because of the inadequacy of modelling software (one of the major problems being it can’t take into account dynamic river bed changes), a model is only one of the inputs into responsible decision making. The submitter stresses that no one from GWRC has come to their farm to discuss this issue and that if they had, the submitter would have shown them the .95 m in water level mistake they have as a datum for their model and many hundreds of thousands of dollars would have been saved in rate payers funds. The submitter details that their group of concerned citizens, called WAG Too – Waipoua Action Group, are strengthened by 6 experienced engineers and can offer much helpful support.

**Submitter 35** suggests that the proposed Te Kāuru Upper Ruamāhanga Floodplain Management Plan is flawed. The submitter details that it has used a flawed and outdated top down model that means that there is no deep and sustainable community involvement. The submitter details that the Plan assumes that the catchment will be overcome with catastrophic climate change impacts that are unsupported. The submitter notes that the Plan appears well analysed on the surface but may suffer from the same flaws that the early work on the Waiohine Flood Plain Management Plan suffered from, that will render the findings open to challenge.

**Submitter 35** suggests that the Plan is Masterton centric of necessity but does not consider the impacts on South Wairarapa or Carterton District in any way. The submitter stresses that GWRC must put a stop to the current approach to the Te Kāuru Upper Ruamāhanga Floodplain Management Plan and restart the process with a genuine grassroots, bottom up, community drive process involving better data and much higher quality analysis of the science, the costs, and the funding of the scheme. The submitter stresses that GWRC must stop any consideration of the Plan until the flaws are comprehensively addressed.

**Submitter 35** notes that the TKURFMP, with its extensive written analysis, copious references, stunning photography, and well-constructed graphics, presents a superficial plausibility. However, the submitter stresses that they feel that the quality of analysis, like that done for the Ruamāhanga Whaiatua and the early attempts at the WRFMP, is flawed. The submitter details that the analyses seen from other interested parties indicates that the superficially plausible analyses are deeply flawed. The submitter raises that stories conveyed by WAG members on the crude heuristics used to determine freeboard analysis and the impact of climate change and the inept use of LIDAR images in the early work at Waiohine calls into question the quality of the TKURFMP.

### 3.12.4 Requests for delay of the process until independent audit is available and can be considered and incorporated

Related to the concerns expressed about the FMP submissions and development process (see above), many submitters (**Submitters 11, 14, 23, 24, 25, 27, 31, 32, 33, 35, 36, 38, 39, 40, 41, 42, 43, 44, 45, 46, 48, 51, 59, 60**) express specific concerns about if/how the independent peer review/audit of the modelling (currently underway) will be incorporated into the FMP, and seek for GWRC to halt the FMP process until the independent audit is complete and the facts are clear.

**Submitter 11** queries how the peer review of the modelling that Matt Gardiner will carry out will be incorporated into the FMP. The submitter states that the modern techniques along with superior lidar mapping would greatly enhance accuracy.

**Submitter 14** calls for the completion and inclusion of all modelling material into the submission process.

**Submitter 23** stresses that the submission process should include the findings of the peer review that Matt Gardiner is currently carrying out. The submitter raises that Matt is doing some essential modelling work that may expose major flaws in the plan and that this work will not be completed until June. Reference is made to a 'Community-led river plan process' as per above.

**Submitter 24** does not support the current proposal, suggesting that it appears to be poorly researched and has not considered or included the findings of the peer review that Matt Gardiner is currently carrying out.

**Submitter 25** believes that the submission due date is premature, and that the deadline needs to be extended. The submitter identifies that it has been brought to their attention that the Flood Protection department only recently signed a contract (late in March) to undertake an independent audit of modelling of some critical sections of the Te Kāuru river system. The submitter notes that the results of this audit are only likely to be finalised mid to late 2019 and that is impossible for parties to make submissions when relevant data is not available. The submitter suggests that it is possible that all of the Te Kāuru western river flood footprints may need to be modified as a result of the findings.

**Submitter 27** understands the GWRC is having its modelling peer reviewed. The submitter suggests that this peer review should be made available to the public, and the submission deadline extended to allow considerations for those findings.

**Submitter 31** requests that the process is stopped until the independent audit is complete and the facts are clear.

**Submitter 32** believes this process needs to be halted until the independent audit that was agreed to by the GWRC is completed and the facts about the situation are clear. The submitter believes the local community has the right to have accurate and informed data and to have GWRC to use this data to make sensible decisions on projects that will be paid for by the rate payers.

**Submitter 33** notes that GWRC has agreed to an independent audit assessing the risks of the Waipoua flood plain, but submissions close before this can be completed. The submitter asks GWRC to respect this process and wait until the audit has been completed so that GWRC have all the facts on hand before making a decision on this very expensive proposal. The submitter notes that GWRC have already invested a lot of time and money into allowing the public to have their say on the proposal and so asks that GWRC allow those in the community who are doing a

lot of work to research the flood protection plan to have their say, so that the best decision can be made with all the information available.

**Submitter 35** suggests that consultation documents posted to GWRC's website are silent about the apparent engagement by GWRC of a contractor to undertake an independent audit of modelling of some critical sections of the Te Kāuru river system. The submitter notes they were informed that the results of this audit are only likely to be finalised in mid to late 2019. The submitter raises that this audit, if WFMP is any guide, will result in significant changes being required in the TKURFMP. The submitter details that it is unreasonable of GWRC to proceed with the hearings for the TKURFMP when the relevant data is not confirmed and the submitter stresses that meaningful submissions cannot be made if the audit results in modifications to the plan. The submitter urges GWRC to pause the TKURFMP process and restart the process when the audit is complete.

**Submitter 36** stresses that they do not have confidence in either the current decision-making process or the data upon which decisions are being made. The submitter believes that the modelling and the data it is based on are inaccurate, resulting in highly exaggerated risk prediction. The submitter believes no further actions should be taken until the independent audit has been completed, at which time the community should be more fully involved in decision making.

**Submitter 38** opposes decisions being made on this important matter before the results of the independent audit of the Te Kāuru Upper Ruamahanga Floodplain Management Plan have been made public. The submitter believes there should be an opportunity for the community to study the engineering report and understand the implications before the decision-making process continues. The submitter also notes that the local community has a right to control the process for decision making.

**Submitters 40 and 48** state that the local community has a right to accurate and informed data.

**Submitter 41** states that as the proposal relies on accurate information to plan for floodplain management, it is vital that the information from the independent audit is included and no decisions should be made until that audit is complete. In addition, the person doing the audit should have access to all the submissions so they can consider the information from these in the audit.

**Submitter 44** considers it totally irresponsible to not delay the submission deadline to include the independent audit – it means that council is making decisions without all available information.

**Submitter 45** states that the process should stop until a full independent audit is carried out by a suitable qualified hydrologist that has not been employed or has any connection with GWRC in any shape or form.

**Submitter 46** states that the cut-off date for submissions is well before the independent audit finalises its findings and therefore interested parties are unable to make submissions with all the relevant information. The submitter strongly requests that further submissions be accepted after the audit has been made public if interested parties feel the need to do so.

**Submitter 51** believes that the information tabled by WRC is flawed.

**Submitter 59** states that the closing date for submissions should be extended until after the independent audit is completed. The submitter also supports the formation of a WAG Too group as a community initiative.

### 3.13 Other issues

In addition to the above key issues, submissions raised a number of other matters related to the Te Kāuru FMP – these are summarised below.

#### 3.13.1 Cultural values for Wairarapa waterways

Two submitters raise concerns with taking account of cultural values.

**Submitter 18** highlights that a cultural values evidence report was done in August 2011 which looked at cultural values for Wairarapa waterways by Ohau Ltd. The submitter identified that the report also made recommendations in setting minimum low flows and recording sites to be developed at Double Bridges, Te Ore Ore Road bridge and Gladstone road bridge. The report also has recommendations for the Waipoua river, Kopuaranga river, Makoura stream, Waingawa river, Taueru river and both Parkvale stream and Booth Creek, which the submitter does not believe any work has been completed.

**Submitter 25** considers that in terms of cultural aspects, the investigations are light and a detailed report from the two Iwi is required which outlines their views on the proposed management practices and how they will achieve their desired outcomes.

**Submitter 30** stresses that rivers are the lifeblood of our communities and should be treated with the most love, honour and respect at all times. The submitter stresses that some management approaches and common methods on other major project responses have not always given the love, honour and respect that our rivers deserve.

#### 3.13.2 Specifications for the management of rivers

**Submitter 20** notes that what is lacking is a set of specifications to which the rivers are managed, noting something similar to what is used in the building trade, so everyone is aware what is occurring. The submitter notes the GWRC have a set of expectations (specifications) from 'interested parties' noting that it appears that council have adopted these 'interested parties' specs when considering management. The submitters queries why people bordering the river, paying rates etc are not included in spec provision management. The submitter recommends combining the parties. The submitter has concerns with the typical channel location, which they believe the specifications would apply to.

**Submitter 20** notes they have no issues with inner and outer management lines but takes issue with the typical channel location and specification which apply. The submitter notes that small freshes and floods are managed reasonably well, but it is medium sized events which are going to do the damage, with the bigger ones being unmentionable. The submitter highlights the fact that rivers exist to transport water generated in the mountains to sea and that for the past 150 years practice has been to expect water to travel in a defined alignment that has been dictated by man. The submitter proposes a detailed specification which includes:

- In the typical channel location and situated more in the middle of the width there should be no island build up that is more than 300mm above normal water flow level. This should allow any fresh or medium flood event to align itself with the typical channel location and so staying inside Council's blue lines.
- The submitter would like to see this applied across Candy's and aerodromes cross section. The submitter believes the three close 3 gravel extractors should provide input

which would not cost the scheme anything to administer a specification to that reach of the river.

- The submitter raises a quote which notes that removing gravel helps limit erosion and increases capacity to cope with flooding.
- The submitter believes as a collective we need to increase the capacity to allow for the minor to medium events.
- The submitter believes this will eliminate current situations where river flows are normal, being directed towards a bank that in minor events, damage is done to the bank. Taking the gravel from the centre and placing it at the side in the form of a groin will mean the river takes the material and places it back in the centre, and the exercise repeats
- The submitter queries the difference between a “flood volume” and annual gravel tasks in terms of gravel take allowances. The submitter believes the clear clean river channels would mitigate damage to buffer zones in flooding.
- The submitter details that other interested parties want to reduce river velocity in a flood at low flow. The submitter does not believe the volume of water can be slowed down and that at low flows it can meander as long as the islands are no higher than specifications.

### 3.13.3 Correct identification of Powerco assets in FMP

**Submitter 56** supports the approach of identifying existing Powerco assets in Reaches 4, 5, 16 and 17 of the FMP area the relevant flood/erosion issues and their consequence and likelihood. However, the submitter notes that some of its assets are incorrectly identified as ‘transmission lines’ rather than ‘sub-transmission’ or ‘distribution’ lines. The submitter clarifies that ‘transmission lines’ are national grid lines operated by Transpower therefore it is important to ensure Powerco’s assets are correctly identified. The submitter requests that several references in the FMP be updated as follows (and as shown on ‘Attachment A’ to their submission):

- Reach 4 – ID 48 – Powerlines north of Te Ore Ore Bridge: the references to ‘transmission lines’ for Reach 4 on page 66 and in Appendix 5 (Issue Summary) should be updated to ‘sub-transmission lines’;
- Reach 5 – ID 52 – Powerlines near Henley Lake Park: the references to ‘transmission lines’ for Reach 5 on page 74 and in Appendix 5 should be updated to ‘distribution lines’;
- Reach 16 – ID 176 – Upstream of the rail bridge where SH2 crosses the Waingawa River: the references to ‘transmission lines’ for Reach 16 on page 156 and in Appendix 5 should be updated to ‘sub-transmission lines’.

### 3.13.4 Insurance premium impacts and considerations

**Submitter 10** states that GWRC have been doing excellent work informing Oxford Street residents and provides thanks for all the hard work. However, they raise concerns in terms of their increasing home insurance premium as a result of being in a floodplain and suggest that GWRC scale back some of the FMP costs so some funds can be reserved for Oxford Street

residents when a flood happens. The funds could be earmarked for removing water from flooded homes and could be like an EQC fund.

### 3.13.5 Other water issues - storage, quantity & quality

Some submitters (**Submitters 2, 12, 18**) expressed concern that the key issue for Masterton into the future is providing for water storage and the work being done should be focused on looking at capturing and storing water for water supply purposes.

**Submitter 12** states that if dams were put in this would help control river levels and the work put forward by the FMP would not be needed.

**Submitter 18** raised concerns over the current state of water in terms of both quality and quantity. The submitter noted that there are no deep pools for swimming, that there are a lot more stagnate pools and that water needs to be slowed down to recharge the aquifer.

### 3.13.6 Queen Elizabeth Park Lake

**Submitter 22** implores GWRC to not stop river water being taken for the Queen Elizabeth Park lake. The submitter stresses that the water runs back into the river when lake levels are sufficient and that if the flow got completely stopped the lake would turn into a bog.

### 3.13.7 Planning and Policy responses

**Submitter 27** states that it is not discernible from the plan but from their discussions with people with a greater understanding, the new building floor levels in the CBD may change. The submitter notes that they do not support any changes to CBD building rules and regulations without consultation and that consultation has not occurred.

### 3.13.8 Emergency Management responses

**Submitter 10** considers that the GWRC could also make sandbags available to residents if a flood is anticipated.



## Appendix 1: Table of Submitters

<b>Submitter No.</b>	<b>Submitter Name</b>	<b>Support/Neutral/ Oppose</b>	<b>Wishes to be heard Y/N</b>
1	Dean Wilkinson	Oppose	Y
2	Des Ward	Neutral	N
3	Daniel Hughes	Neutral	N
4	Michelle Romia	Neutral	N
5	Jim Simmons	Support	N
6	Rex Feremor	Support	N
7	Kate & Mike Spackman	Oppose	N
8	Alister Reid	Oppose	N
9	Ross Cottle and Graeme Hugh Tulloch (joint submission)	Oppose	Y
10	Giuseppe Cugliari	Neutral	N
11	Michael Ashby	Oppose	Y
12	Michael Playford	Neutral	N
13	Iain Bowbyes	Neutral	N
14	Chris Peterson	Neutral	Y
15	Megan Flynn, TWL Property Holdings Ltd	Oppose	Y
16	Tom Kay, Forest & Bird	Support	Y
17	Graham Dick	Oppose	Y
18	Rangitane O Wairarapa Inc.	Neutral	N
19	Kate Spackman & Mike Geenty	Neutral	N
20	Richard Butler	Oppose	Y
21	Shelley and Bob Hall	Oppose	N
22	Benjamin Evemy	Neutral	N
23	Jill Vivian Greathead	Oppose	Y
24	Ian Hawken	Oppose	Y
25	Sustainable Wairarapa	Oppose	Y
26	Bridget Evans	Oppose	N
27	Masterton Trust Lands Trust	Oppose	N
28	Wendy Leitner	Neutral	N
29	Perry Cameron	Neutral	N

Appendix 1: Table of Submitters

Boffa Miskell Ltd | Te Kōhuru Submissions - Key Themes Report 20190418 | [Subject]

30	Sally Walker	Oppose	Y
31	Giuseppe Cugliari	Oppose	N
32	Lynton Baird	Oppose	N
33	Anna Baird	Oppose	N
34	Andrew Richmond Donald	Oppose	Y
35	Wairarapa Voice Inc	Oppose	Y
36	Carol and Malcolm MacDonald	Oppose	N
37	David Famularo	Support	N
38	Bronwyn Reid	Oppose	N
39	Gaylene Rodgers	Oppose	N
40	Steve Rodgers	Oppose	N
41	Anne Donald	Oppose	N
42	Helen Elizabeth Dew	Oppose	N
43	Mark John Hall	Oppose	N
44	Brian Michael Barton	Oppose	N
45	Billy Denton	Oppose	N
46	Robyn Williams, Kevin Wilson and Brad Wilson	Oppose	N
47	Stuart James McKenzie	Support	N
48	Di Chesmar	Oppose	N
49	Duncan Richard Stuart	Oppose	Y
50	Kyle Wells	Oppose	N
51	Garth Baylis	Oppose	N
52	Garry Daniell	Oppose	N
53	Scott Abbott	Oppose	Y
54	Fish and Game	Neutral	Y
55	Margaret Phebe Feringa	Support	N
56	<i>Late Submission</i> Powerco	Support	Y
57	<i>Late Submission</i> Ron Garrod	Oppose	Y
58	<i>Late Submission</i> Michael Richard Hewison	Oppose	Y

59	Graham McClymont	Oppose	N
60	<i>Late Submission</i> AJ Barton	Oppose	Y
61	<i>Late Submission</i> Carterton District Council	Support	Y



## Proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan – Officers comments on submissions

Officers comments on submissions			
No.	Name	Submission Summary	Officers comments
1	Dean Wilkinson	I do not agree with letting the river meander. Once the river is close to private land on the edge of the buffer it will only take one large flood event to erode possibly metres. Planting the buffers are a waste of time and money. The idea of letting wetlands develop in this particular reach (Waingawa) is a pipe dream. There is also very little recreational activity on this particular reach. If there is a loss of land then I will seek compensation.	The concepts and common methods within Te Kāuru provide the overall long-term strategy for the catchment. It is acknowledged that each reach and each location within the catchment will need to be managed on a site-by-site basis.
2	Des Ward	Masterton needs water storage!	Water storage for water supply is a separate issue to floodplain management plans. Water storage for flood mitigation was considered as part of the Waipoua flood management approach but not considered viable as a standalone mitigation method.
3	Daniel Hughes	Nothing written in submission	N/A
4	Michelle Romia	Nothing written in submission	N/A
5	Jim Simmons	In full support	N/A
6	Rex Feremor	Continue metal extraction	Gravel extraction will continue as outlined in section 3.2.4 Gravel Extraction and Analysis.
7	Kate & Mike Spackman	Don't want to lose land unless we are paid for it.	Section 3.3.8 Strategic Land Purchase outlines the proposed approach.
8	Alister Reid	Concerns regarding an extension to the buffer zone. Who's going to pay for the control of weeds? We would expect compensating for the loss of land Unreasonable to expect farmers to pay for damaged infrastructure if you're allowing the river more room	The buffer is not being extended from where it is now. On review of aerial photography of this property it shows that the buffer is currently already planted.  <i>NB: Aerial shows buffer on this property is already mostly planted (see aerial photo attached)</i>  Section 4.4.2 of the proposed Te Kāuru FMP outlines a process for pest plant and animal management. The Hearings Subcommittee may wish to consider an extension of the time GWRC takes responsibility for weed control in the buffer area from two years to between three and five years. This would mean increasing the costs estimates for the riparian management officer to \$120,000 per annum rather than the \$60,000 currently proposed. Costs regarding spray and bait to manage pests have already been incorporated into the proposed FMP for the life of the plan.  Te Kāuru does not propose compensation for loss of land, however Section 3.3.8 of the FMP outlines the strategic land purchase approach.
9	Ross Cottle and Graeme Hugh Tulloch (joint submission)	Concerned the plan was to acquire land for creating margins to allow the river to meander. This is going to cause a lot of erosion putting a lot of sediment into the river. Planting will result in an infestation of weeds and pests. I do not believe you have made any provision for effected farms to be adequately compensated for loss of land Landowners should not have to pay for this (planting and land loss). If this is what the community wants then they should pay for it. If the intention is to increase the capacity of the river to cope with high flood situations it will be necessary to widen the river in the area of both the road and rail bridges, which would be extremely expensive.	The concepts and common methods within Te Kāuru provide the overall long-term strategy for the catchment. It is acknowledged that each reach and each location within the catchment will need to be managed on a site-by-site basis.  Te Kāuru does not propose compensation for loss of land, however Section 3.3.8 of the FMP outlines the strategic land purchase approach.  It is not considered necessary to widen the bridges. Protection of bridge piers from erosion will be considered in conjunction with the asset owner.
10	Giuseppe Cugliari	Please reduce cost of works through Waipoua urban reach so our insurance costs don't increase	Implementation of a flood management approach for the Waipoua urban reach will be the most effective way of managing insurance issues
11	Michael Ashby	Why did the project team not include some detractors, especially those that could challenge GWRC officers? I believe Matt Gardiner has been appointed to do a peer review of the modelling. How are you going to incorporate this into your FMP? Buffer zone will be haven for predators and pests.	Assumption: this is referring to the Te Kāuru Subcommittee. The Subcommittee is made up of a broad range of community and local government representatives, as illustrated in Appendix 1 of the FMP.  The independent audit report is due on 17 May 2019. The Te Kāuru Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019, prior to the adoption of the plan.  Section 4.4.2 of the proposed Te Kāuru FMP outlines a process for pest plant and animal management. The

## Proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan – Officers comments on submissions

Officers comments on submissions			
No.	Name	Submission Summary	Officers comments
			Hearings Subcommittee may wish to consider an extension of the time GWRC takes responsibility for weed control in the buffer area from two years to between three and five years. This would mean increasing the costs estimates for the riparian management officer to \$120,000 per annum rather than the \$60,000 currently proposed. Costs regarding spray and bait to manage pests have already been incorporated into the proposed FMP for the life of the plan.
12	Michael Playford	If you put dam's in then you wouldn't need to do this work.	Water storage for water supply is a separate issue to floodplain management plans. Water storage for flood mitigation was considered as part of the Waipoua flood management approach but not considered viable as a standalone mitigation method.
13	Iain Bowbyes	Can we please have a swing bridge crossing the river by the rail bridge?	Additional recreational opportunities will be investigated in conjunction with MDC and the community as part of the implementation of this FMP
14	Chris Peterson	I'm supportive of the overall direction and thrust of the Plan in as far as it takes on board changing values and mindsets in the community at large. Concern that not all the modelling has material to the submission process has yet been completed. I hope this can be resolved. It seems appropriate (with the change in rates spread) that those with an interest should be appointed to not only the Advisory Committee but also the eight existing river scheme committees. There will need to be a lot more plants available given the other initiatives currently underway. How better could social well-being be addressed than by having our trees for our land grown, planted and tended by our people?	The independent audit report is due on 17 May 2019. The Te Kāuru Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019, prior to the adoption of the plan.
15	Megan Flynn TWL Property Holdings Ltd	We do not support the new draft plan for the management of the Waingawa River flooding. We strongly object to surrendering or selling off 30M of our property. We do not agree with the "science" put forward for soft barriers and pretty trees We do not support the idea of a walking/cycling trail as it is too dangerous along our stretch We do not support the proposed funding model. This will allow GWRC to rate directly all properties for future river works programmes rather than the few who directly benefit. We do not believe that GWRC has informed all ratepayers sufficiently. You should have put an informative newsletter in with the TA rates. Anyone who lives in Castlepoint would have no idea that they are about to pay for a portion of multimillion dollar river works. We suggest GWRC has not done enough to inform property owners on the river banks of the specific works at their properties.	The funding model proposes to spread the costs across rate payers within the Te Kāuru catchment. Castle Point is outside of the Te Kāuru catchment. We believe we have undertaken a robust consultation and engagement process. Further consultation will be undertaken with the community prior to any structural works being undertaken within the urban reach of the Waipoua River.  Riverside landowners have been directly contacted on several occasions and 22 'coffee group' sessions were successful held between July and September 2018.
16	Forest & Bird	Any flood control work should focus, where possible and appropriate, on the use of natural systems to attenuate flood risk. In particular, this should focus on the widening of the available flood plain/erodible river corridor, the use of wetlands to attenuate flood waters, and a reduction in the area of impervious surfaces in a catchment to promote groundwater recharge and reduce the intensity of flood peaks and adverse effects. In general these sorts of management methods tend to cost less in the long term than engineering 'solutions' and provide a number of ecosystem services, including increasing the availability and quality of habitat for native species. A significant number of New Zealand's freshwater species are threatened with or at risk of extinction, and GWRC should be doing all it can through its flood/river mgmt to protect the habitat of those species. We would strongly support activities to widen erodible river corridors (being the area of floodplain available to the river) across Wellington provided adverse effects on the biodiversity values of any rivers are avoided during any river works. Forest & Bird would support the acquisition of property along the river, including the acquisition and removal of residential homes or infrastructure located in areas that are flood prone, and to allow for a wider river corridor within which to the river will be able to move/flood. Forest & Bird note that acknowledging the risk of and planning for future natural hazards and disasters is extremely important given the potential effects of climate change. Forest & Bird implore GWRC to take as much action as possible to minimise the contribution of the region to climate change, and thereby lessen the risk for what is a coastal and vulnerable region in many respects. We strongly suggest GWRC adopt a system of river mgmt centred on the assessment and retention of 'natural character' and 'habitat quality' of rivers, such as the Natural Character Index (NCI) and the Habitat Quality Index (HQI). These were developed explicitly for	The Te Kāuru FMP proposed to give the river more room within the existing buffers Establishment of wetlands where appropriate has been outlined on page 17, 25 and 135 of the FMP. The aims of the FMP on page 5 is to "protect and enhance our natural spaces" including to: <ul style="list-style-type: none"> <li>a. Improve awareness and understanding of the natural values and character of the river environment</li> <li>b. Improve recognition of impacts of flood and flood hazard management on environmental and ecological values</li> <li>c. Create more space for rivers and their natural processes</li> <li>d. Improve the water quality and habitat diversity along the rivers</li> <li>e. Make the use or extraction of natural resources including gravel management sustainable and compliant with relevant policies.</li> </ul> Page 37 of the FMP outlines the proposed use of the HQI.

**Proposed Te Kāuru Upper Ruamahanga River Floodplain Management Plan – Officers comments on submissions**

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		managing rivers to maximise river health for native species and would be extremely beneficial in assisting council to sustainably manage rivers, and to meet its requirements for the protection and maintenance of biodiversity under the RMA, NPS-FM, RPS, NRP, and other guiding legislation.	
17	Graham Dick	You may have to rethink the strategy. Already the removal of trees on the upstream side of the Colombo Road bridges is resulting in erosion of the river banks. If this continues the abutments of the bridges will be put at risk. Removal of trees along the riverbanks may assist in flood remediation but the consequences in erosion of the riverbanks may be severe and require major engineering to mitigate.	A detailed approach for managing this reach will be developed during Stage 1 of the implementation process.
18 23 26 31 32 33 36 38 39 40 41 42 43 44 45 46 48 51 59	Rangitane O Wairarapa Inc. Jill Greatehead Bridget Evans Giuseppe Cugliari Lynton Baird Anna Baird Carol and Malcolm MacDonald Bronwyn Reid Gaylene Rodgers Steve Rodgers Anne Donald Helen Elizabeth Dew Mark John Hall Brian Michael Barton Billy Denton Robyn Williams etc Di Chesmar Garth Baylis Graham McClymont	Stop the process until the independent audit is complete and the facts are clear. This should be community led.	The independent audit report is due on 17 May 2019. The Te Kāuru Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019,  Greater Wellington Regional Council is happy to work with community groups and members throughout the implementation of the Te Kāuru FMP. The governance structure outlined in the proposed FMP enables significant input from the community through the River Management Groups and Upper Ruamahanga River Management Advisory Committee. The Hearings Subcommittee should consider how a community group focussed on the urban reach of the Waipoua River can be incorporated into the governance structure. There is significant opportunity available for the community to be involved in the process, particularly during Stage 1 of the implementation of the urban reach.
18	Rangitane O Wairarapa Inc	Where has all the WATER gone, the quality and quantity, no deep pools for swimming, a lot more stagnate pools, slow water down to recharge aquifer. Minimum low flow and recording sites should be developed at Double Bridges, Te Ore Ore Road bridge and Gladstone Road bridge. Also recommend it in all Te Kauru rivers as well as Makoura, Parkvale streams and Booth creek.	The Ruamahanga Whaitua process is where water quality and quantity have been assessed. The Whaitua Implementation Plan (WIP), which was approved in August 2018, will be incorporated into the proposed Natural Resources Plan. Te Kāuru has been assessed against the WIP and section 2.7 of the FMP acknowledges that future flood protection works will need to be consistent with the WIP.
19	Kate Spackman & Mike Geenty	River Road Major Project How will the rock groynes affect our property price value? As our property already boundaries the river will these groynes affect our boundary? If so how? How do we stop public using the groynes to access our property? Will you require access to our land do install them? Who's in charge of the weeds that will no doubt cover them? We want to help the river but can't afford anything to go towards the installation. When do you think it will start?	Groynes would be installed in consultation with land owners, access may or may not be required. Costs for the groynes would be part of the river management scheme. The groynes are considered a GWRC asset and would be maintained by GWRC. This project is considered high priority and would therefore likely commence within the first five years of implementation.
20	Richard Butler	What we lack is a set of specifications to which the rivers are managed. Specifications such as: That in your typical channel location and situated more in the middle of the width there should be no island build up that is more than 300mm above normal water flow level. I have no issue with your inner and outer management lines, but what I take issue with is your typical channel location, and it is this where the specifications should apply.	A full review of the inner and outer management lines (typical channel location) will be undertaken as an outcome of this FMP. Specific management of the river corridor is outlined in section 3.2 of the FMP which includes tools available for use and links to the Code of Practice for undertaking works.

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21	Shelley and Bob Hall	We feel TK is only deferred maintenance. The current system is working well. We have already had land taken at 10% of its value by GWRC as a buffer zone, but watched it wash way along with the fences. These buffers will just leave the river banks overrun with gorse and blackberry. How are the costs going to spread over the wider community – by paying more rates?	Section 4.4.2 of the proposed Te Kōhanga FMP outlines a process for pest plant and animal management. The funding proposal outlines a catchment wide rating to spread the costs over the wider community.
22	Benjamin Evemy	Please do not stop river water being taken for the Queen Elizabeth Park lake. The water runs back into the river when lake levels are sufficient. If the flow got completely stopped the lake would turn into a bog.	The water take consent that Masterton District Council (MDC) holds does not form part of this Floodplain Management Plan.
24	Ian Hawken	No consideration of the impact on CDC or SWDC. Proposed costs make no sense at all. Should be community lead and await Matt Gardiner review	The lower Ruamahanga valley will be considered as a separate project in the coming years.
25	Sustainable Wairarapa	Submission date is premature and needs to be extended. Independent audit needs to be completed as it is impossible to submit otherwise SW impressed by the outputs of community driven process (WAG etc) There are strong similarities between the collapse of the Waiohine river project and Te Kauru. The economics are deeply flawed. Figures such as \$5m to purchase land for buffer zone appears to be plucked out of the air. The consultation to date does not align with the special consultative processes required to introduce such a major change in rating. No analysis of the likely impact of the “sawfly” on willows. Also spraying on the margins of waterways has become a hot potato and the chemical glyphosate may become restricted over time. FP have created 2 additional staff members to deliver riparian planting. They are requiring the wider community to fund the purchase of plants and then to volunteer to plant them. This is overkill. The paper delivered by Death is confusing mixing benefits between streams and rivers. The upper reaches of the rivers are degrading. If the river channel is not shifted river edge erosion will continue unabated. Given the imbalance in the funds generated by the targeted rate the wider community should be the majority on any management structure. Quotes section of technical paper “River Natural Character – natural character guidelines for the management of gravel bed river in New Zealand” by Gary Williams April 2017 SW urges GW to stop the current Te Kauru project and implement a community driven model.	The funding model proposed in the FMP will be implemented through changes to the GWRC LTP through a review of the Revenue and Financing Policy and will be subject to public consultation through that process before it is implemented. Community representatives from the River Management Groups comprise the majority of the proposed Upper Ruamahanga River Management Advisory Committee that will oversee the implementation of the FMP.
27	Masterton Trust Lands Trust	I understand the building floor levels in the CBD may change. We do not support this without consultation.	Floor levels for new consents will be recommended by GWRC based on the updated flood maps. These flood maps were released to the community in November 2018 as part of our engagement process and were included in the proposed Te Kōhanga FMP for consultation.
28	Wendy Leitner	If it is to the good of the whole district I am in favour, if not then we submit to the majority.	N/A
29	Perry Cameron	Plan does not consider downstream effects.	The lower Ruamahanga valley will be considered as a separate project in the coming years.
30	Sally Walker	Rivers flood. It's a natural process, you cannot stop it only manage as best you can. It's sad to say but the ones that are meant to caring and protecting our natural resources which are our rivers are part of the problem. These rivers are our lifeblood of our community and should be treated with the most love honour respect at all times. Some management approaches and common methods and other major projects responses have not always given the love honour and respect that our rivers deserve. Never ever take away an asset or resources from our rivers, for example stop banks and strong healthy trees only to replace it with another stop bank and more trees. Wasting time and mass money replacing them, when there was no need to take away these resources in the first place. These trees have a purpose and have take many years to grow, so why are councils doing this mass destruction to our rivers and surroundings? It is so sad to see this carry on in the 21st century. Holding all councils to account for this destruction taking place. Destruction at Te Ore Ore Ruamahanga River and at Gladstone Ruamahanga River with mass tree culling and Waipoua River is sadness and madness only to waste mass money	Trees need to be replaced in some areas where there are crack willows, the trees are in poor condition, or the trees are creating a risk to people or property. The Te Kōhanga FMP proposed to plant a large number of new trees within the catchment to provide erosion protection to the banks of the rivers. Groynes are a proven technique for managing the rivers.

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		to replace them; when there was no need to do this in the first place. If councils had been maintaining these trees in the first place you would not need to mass cull these trees. Please do not try to widen any rivers as this is playing with fire and will cause trouble when the floods arrive. Plus the ripple effect it will create and damage all life forms that live within the rivers itself. Please think about the love honour and respect to our rivers before destroying its habitat and ecosystem an environment. Common sense is a must. With mass gravel and water taking extraction going on this affects the water levels and flow which in turn affects the river beds banks buffers river edges an all life forms living within the river itself. As for these huge rock groynes they don't really do a hell of a lot for the river at all wasting mass money there. Plus they are in the way and you cannot swim through them, and they also affect the ecosystem of our rivers which is our lifeblood of our communities. Just because someone can drive a grader, digger, and bulldozer and use a chainsaw doesn't mean you know how a river system functions. I'm seeing destruction almost at every site that gets touched. Councils must be held accountable for their actions because this is not good enough in the 21st century. Also where are the real photos of real floods? Masterton has had many many floods in the last 20 years, so why are there no actual photos, only projections this is not good enough councils show actual floods please. Also take photos before you start any works and during and after works so the public can see just what been going on. Now also look at where money is being spent does it really cost this much or just rough guessing it. \$50 thousand River Road, \$755 thousand Hood Aerodrome, Rathkeale College \$1 million wow really. Please stop wrecking our natural environment councils, always apply honour accountability and common sense and respect at all times when doing any works to our rivers an environments please councils. Destruction to our rivers an ecosystems has to STOP RIGHT NOW.	
34	Andrew Richmond Donald	Stop spending any more money on the lower Waipoua section (Mahunga to the end of the river) until the independent audit is completed and we have learnt the truth. The common response from the people from Oxford street, that we have met with (about 60) GWRC have an agenda - they need a substantial capital works programme, to borrow against their funding model. They think the model is totally over cooked and crazy! We have records that show that the first ranked flood - '98' was the the highest flood since 1897 ie 122 years and although we have been told that Niwa call it a one in one hundred year flood , we await the independent audit comment. As a community we should be able to determine the risk factor and Greytown has decided to use 10% climate change addition. The chief GWRC climate change scientist states that nobody knows if we are going to warm or cool in this period of uncertainty . We may choose to be conservative, but we need informed debate. Because of the incompetent processes that GWRC have employed in the last 4 years a new system of managing flooding risk needs to be employed ,similar to Greytown. Senior GWRC's engineers say, that because of the inadequacy of modelling software (can't take into account dynamic river bed changes, being one of the major problems), a model is only one of the inputs into responsible decision making. No one From GWRC has come to my farm to discuss the issue. If they had I would have shown them the .95m in water level mistake they have as a datum for their model and many hundreds of thousands of dollars would have been saved in rate payers funds. Our group of concerned citizens , called WAG Too -Waipoua Action Group , are strengthened by 6 experienced engineers and can offer much helpful support. We agree Ian Gunn's submission	<p>The independent audit report is due on 17 May 2019. The Te Kāuru Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019, prior to the adoption of the plan.</p> <p>Climate change has been assessed in accordance with appropriate guidelines and is a requirement under the Resource Management Act 1991 (RMA). The Te Kāuru FMP outlines a five stage process for implementation of the Waipoua urban reach. Stages 4 and 5 allow a review of the flood risk including any further data or information available on future effects of climate change prior to undertaking structural works to manage the risks of climate change.</p> <p>No structural works within the Masterton urban reach of the Waipoua River are proposed without further data collection, planning, engagement and design. GWRC will work with MDC and the community during this first stage of the implementation process to ensure agreement on the approach for this reach.</p> <p>Three consultants from WSP Opus, on behalf of GWRC, spent time with Andrew Donald at his property and along the Waipoua River after offering to 'ground truth' information in the modelling.</p>
35	Wairarapa Voice Inc	The proposed Te Kāuru Upper Ruamahanga Floodplain Management Plan is flawed. It has used a flawed and outdated top down model that means that there has been no deep and sustainable community involvement. The Plan assumes that the catchment will be overcome with catastrophic climate change impacts that are unsupported. The Plan appears well analysed on the surface but may suffer from the same flaws that the early work on the Waiohine Flood Plain Management Plan suffered from, that will render the findings open to challenge. The Plan is Masterton centric of necessity but does not consider the impacts on South Wairarapa or Carterton District in any way. The Plan mentions many totals for the costs of the work but the widely divergent amounts used in the Plan suggest that costs are not understood and have not been subject to any analytical rigour. The Plan suggests a substantial change to the way the Plan is funded and how it is rated to the various ratepayers in the catchment. The Plan does not meet the test of the "special consultative procedure" necessary to make such a change to the funding model.	<p>Climate change has been assessed in accordance with appropriate guidelines and is a requirement under the Resource Management Act 1991 (RMA). The Te Kāuru FMP outlines a five stage process for implementation of the Waipoua urban reach. Stages 4 and 5 allow a review of the flood risk including any further data or information available on future effects of climate change prior to undertaking structural works to manage the risks of climate change.</p> <p>The proposed changes to funding will need to be implemented through the Revenue and Financing Policy. Any changes to the R&amp;F Policy will be made using a special consultative procedure as part of the Councils LTP consultation.</p>

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		Greater Wellington Regional Council must put a stop to the current approach to the Te Kōuru Upper Ruamahanga Floodplain Management Plan and restart the process with a genuine grass roots, bottom up, community driven process involving better data and much higher quality analysis of the science, the costs, and the funding of the scheme.	
37	David Famularo	Would like to see crossblading halted. Any work that destroys pools should be halted. Agrees with the principles of the plan, wants more planting.	Cross-blading is one tool that is used by Greater Wellington and is within the Code of Practice for Flood Protection. Cross-blading is not a specific consideration within this FMP.
47	Stuart James McKenzie	I urge you to give more consideration to the Whangaehu River in the FMP and increase grants to enable this to happen. Assistance is needed to be in the form of both an increase in monetary grants but also access to those who have the expertise in willow removal. I welcome a discussion on my farm.	Consideration could be given to this request to provide more funding to the Whangaehu River for willow removal. The Hearings Subcommittee may recommend that it is noted on page 180 of the FMP.
50	Kyle Wells	I do not understand the benefits of Habitat diversity and the science around it. One the river gets into an erosion area, it's difficult to get it out. This will exasperate the sediment issues Giving the river more room will take away farmland with no benefit to the landowners. Will they be compensated? The scheme has been operating successfully for decades, this investment will be quickly eliminated fi the river is allowed "more room"	A report discussing the science and benefits of the buffer management proposal by Professor Russel Death is available on request.  Te Kōuru does not propose compensation for loss of land, however Section 3.3.8 of the FMP outlines the strategic land purchase approach.
49	Duncan Richard Stuart	The Williams plan is working well now that the trees are fully-grown. They stop the bank from eroding while allowing the floodwater to filter through these trees and spread out naturally over the flood plain.  The Te Kauru Upper Ruamahanga Floodplain Management Plan will mean these well established willows, that once contained the river, will be allowed to be washed away by the river, along with up to 50 meters width of young trees. These trees will be deposited on islands of gravel in what was once the riverbed. Once the river gets in this position it will bounce back and forth, creating havoc just as happened in the 70's and 80's.  Buffer zones will grow fescue that is waist deep and collect logs and debris and large amounts of silt. Very soon this silt and debris will create a new stop-bank leading to a narrower river, faster running water, bank erosion and an uncontrollable river. Water flows easily over pastures, but not over buffer zones.  I could lose 4 ha of prime grazing land with this proposal. I'm not convinced that the plan to get volunteer groups to fence, plant and spray weeds on this land is practicable knowing that the river could wipe out the plantings and work undertaken. The GWRC plan will allow these trees and this work to be taken away by the river.  I say control the banks and let the water filter through the trees and deposit the silt onto the wide flood plain.  The plan as it is currently proposed would have a severe impact on the financial viability of my relatively small family dairy farm, which has been farmed by my family for 90 years. I would like to speak to this submission and further explain just how significant these changes would be for my family and I and to elaborate my reasons for objecting to the proposal	At the time of the hearing process the changes proposed for this site have not been confirmed. Further conversations are needed before we can confirm a way forward.  The inner and outer management lines through this section of the Ruamahanga River are very narrow and need to be widened to reduce the ongoing erosion of banks on both sides.  The Te Kōuru FMP proposes to use mixed riparian planting as the primary method for bank erosion protection throughout the catchment, how this is done at this site is a work in progress.
52	Garry Daniell	There is no need for our property to be considered within your floodplain considerations.	Areas of this property are showing as at risk of flooding in a 1% AEP event both with and without climate change
53	Scott & Elaine Abbott	Please remove my property from the buffer and the FMP	One outcome of the Te Kōuru FMP is a full review of the design lines. This review will consider the inner and outer management lines for the whole catchment and assess the rivers as a whole system. Site specific matters will then be taken into consideration to determine the final alignment.
54	Fish and Game	This FMP provides a positive first step away from this current engineering heavy approach to river management, by incorporating the simple principle of "allowing the river more room to move". Allowing the river to naturally move within its floodplain, within reason, and with appropriate human intervention (such as an agreed planting programme) will over time reintroduce natural elements to the system that have been lost.  Allowing the river to move", hints at a multiple objective approach to floodplain management. However, this is not clearly stated in the FMP. The multiple objectives that flow naturally from a wider floodplain include: a. Maintaining ecosystem health.	Of the objectives listed, items (a) to (d) are included in the aims of the Te Kōuru FMP on page 5. Item (e) is noted

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		<p>b. Improved recreational value of the river system.                      c. Increased public access for recreational use.                      d. Enhanced habitat for all aquatic life within the catchment.                      e. Enhanced wetland habitat.</p> <p><i>Fish and Game requests that these are stated as objectives within the flood plain management plan. The objectives will assist with resolution of regional council action in the face of any dispute.</i></p> <p>Fish and Game considers the FMP deficient in the following areas:</p> <ul style="list-style-type: none"> <li>• Outlining dates and timeframes by which critical monitoring work must be undertaken <i>Fish and Game requests that this work is undertaken with urgency by 2022.</i></li> <li>• It is not clear how public access will be incorporated into river design. This needs to be made explicit. <i>Fish and Game requests that the FMP state that public access to the river is a primary goal, alongside giving the river more room</i></li> <li>• Other community values need to be incorporated into the FMP to ensure multiple objectives are defined, monitored, and help guide river management principles in subsequent implementation</li> <li>• The FMP is not clear on what happens to accreted land. It should set in place a process by which accreted land becomes local purpose reserve or similar. <i>Fish and Game notes that where accreted land becomes freehold that the regional council can lose future access to the riverbed as a result.</i></li> <li>• A risk to the FMP, which is unquantified, are private gravel consents. The location, timing, quantity, expiry date, and potential for review of these consents needs to be determined and listed.</li> <li>• The council should develop a process for determining <i>ad media filum</i> rights to the centreline of the river, and identify which land titles these rights exist on in the process of obtaining other permissions and working on the river.</li> </ul> <p>The section related to the Environmental Enhancement Fund should be deleted. The governance of the fund should sit under the resource consent</p> <p>Fish and Game would like to see a more streamlined process for governance.</p> <p>A section covering community engagement/acceptance and conflict management needs to be inserted.</p> <p>The monitoring section needs revision...                      A key tool in this is the habitat quality index - HQI/HCI.</p> <p>A definition of natural character with respect to the river body should also be included:                      "The combination of landscape, morphological, hydrological, ecological features on a floodplain that would be present with minimal human intervention."</p> <p>Fish &amp; Game are seeking stronger acknowledgment in the FMP to achieve outcomes that:</p> <ul style="list-style-type: none"> <li>• Improve ecosystem health (e.g. indicators monitored by MCI and fish counts).</li> <li>• Maintain and improve habitat quality and extent for trout and native fish.</li> <li>• Maintain and improve habitat for terrestrial species including game birds though riparian and adjacent</li> </ul>	<p>on page 17, 25 and 135.</p> <p>A monitoring programme will be developed as an outcome of this FMP. No timeframe for the development has currently been stated in the FMP.</p> <p>One of the aims of the Te Kōwhiri FMP on page 5 is to "Identify and support opportunities for improved public access to and along rivers"</p> <p>Accretion is a separate process, outside of this FMP.</p> <p>Page 37 outlines the proposed use of the HQI.</p>

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		<p>wetland management.</p> <ul style="list-style-type: none"> <li>• Improve trout fishery robustness through maintaining and enhancing diversity of habitat (i.e. not so prone to either direct effects of river works or effects of principal focus to manage high river flow design).</li> <li>• Maintain and improve recreational access including for trout fishing and other outdoor pursuits.</li> </ul>	
55	Margaret Phebe Feringa	I want to applaud their recognition of the ecology of the river systems in the floodplain and how best to improve this. With your positive plan and the work of farmers, towns people, communities, we can look forward to a better future.	N/A
56	Powerco	<p>Powerco notes that some of its assets are incorrectly identified as 'transmission lines' rather than 'sub-transmission' or 'distribution' lines (reaches 4, 5, 16 and 17)</p> <p>Potential conflict between riparian planting and existing electricity infrastructure. Potentially dangerous as vegetation growing in close proximity to electricity can result in flashovers.</p> <p>Proposed relocation of existing electricity poles in the Waingawa River channel – these are poles rather than pylons, please correct.</p> <p>Powerco has not, to date, had any formal approach from GWRC regarding the relocation of the poles.</p> <p>Homebush WWTP. It is not clear whether such electrical works will affect Powerco assets.</p>	<p>Work with Powerco to ensure assets are correctly identified and update in the FMP.</p> <p>Acknowledge that planting will be undertaken as appropriate with respect to electricity infrastructure.</p>
57	Ron Garrod	<p>Current management is working well. Concern that the old idea of letting the river wander will return us to the failed and costly mistakes of the past.</p> <p>The acquiring of private land to form larger buffer zones, to allow the river to eat them away to a predetermined management line, before some repairs are done seems illogical.</p> <p>We are also concerned about the very nature of the buffer plantings which in concept has a good environmental feel but the reality will be at high water flows and flood times, deposits of debris and rubbish, dead, dying and rotting vegetation, will deposit itself among the plantings in the buffer zone causing an ugly and smelly, rodent infested environment.</p> <p>With reference to the governance structure: The retention of the individual River Advisory Committees, feeding into a larger management body appears to be sound as the Waipoua Advisory Committee has often stated that it sees this river as unique with features distinct from the larger rivers in the area and needs a specific Advisory arm.</p>	<p>The concepts and common methods within Te Kōwhiri provide the overall long-term strategy for the catchment. It is acknowledged that each reach and each location within the catchment will need to be managed on a site-by-site basis.</p> <p>Section 4.4.2 of the proposed Te Kōwhiri FMP outlines a process for pest plant and animal management.</p>
58	Michael Hewison	<p>My concerns are:</p> <p>Process overall</p> <p>Community understanding of repercussions of the project</p> <p>Overall community input</p> <p>Rumour of peer review due mid to late this year.</p> <p>Overall procurement process</p>	<p>The independent audit report is due on 17 May 2019. The Te Kōwhiri Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019, prior to the adoption of the plan.</p> <p>Greater Wellington Regional Council is happy to work with community groups and members throughout the implementation of the Te Kōwhiri FMP. The governance structure outlined in the proposed FMP enables significant input from the community through the River Management Groups and Upper Ruamahanga River Management Advisory Committee. The Hearings Subcommittee should consider how a community group focussed on the urban reach of the Waipoua River can be incorporated into the governance structure. There is significant opportunity available to the community to be involved in the process, particularly during Stage 1 of the implementation of the urban reach.</p>
60	AJ Barton	I shall need more time to evaluate the proposed Plan properly and furthermore, I understand that there is more work currently being done on the plan which will not be completed for some time yet. If this is the case then it makes no sense to hold a hearing until this additional work is complete and available so would you please delay hearing until such time arrives.	The independent audit report is due on 17 May 2019. The Te Kōwhiri Subcommittee will consider the outcomes of this report once it is received and consider the matter and any actions that may need to be undertaken at the Subcommittee meeting on 28 May 2019, prior to the adoption of the plan.

**Proposed Te Kōwhiri Upper Ruamahanga River Floodplain Management Plan – Officers comments on submissions**

Officers comments on submissions			
No.	Name	Submission Summary	Officers comments
61	Carterton District Council	<p>In support of:</p> <ul style="list-style-type: none"> <li>• Vision and principles (notes that CDC LTP community outcomes need updating on page 4)</li> <li>• Gravel extraction</li> <li>• Pest management within buffer zones (would like to see costs and responsibility for pest control be shared between GWRC and catchment groups on an ongoing basis)</li> <li>• Riparian Management Officer</li> <li>• Care groups and clubs</li> <li>• Governance structure</li> <li>• Carter's Reserve</li> <li>• Funding model</li> </ul>	<p>Update CDC LTP community outcomes on page 4 of the FMP</p> <p>Hearings Subcommittee may wish to consider an extension of the time GWRC takes responsibility for weed control in the buffer area from two years to between three and five years. This would mean increasing the costs estimates for the riparian management officer to \$120,000 per annum rather than the \$60,000 currently proposed. Costs regarding spray and bait to manage pests have already been incorporated into the proposed FMP for the life of the plan.</p>

**Submission 8 – Alister Reid**

Aerial of property:

