# Taranaki Thoroughbred Racing

Monitoring Programme
Annual Report
2020-2021

Technical Report 2021-85





Taranaki Regional Council Private Bag 713 Stratford

ISSN: 1178-1467 (Online)

Document: 2942601 (Word)

Document: 2956329 (Pdf)

March 2022

# Taranaki Thoroughbred Racing

Monitoring Programme
Annual Report
2020-2021

Technical Report 2021-85

# Taranaki Thoroughbred Racing

Monitoring Programme
Annual Report
2020-2021

Technical Report 2021-85

Taranaki Regional Council Private Bag 713 Stratford

ISSN: 1178-1467 (Online) Document: 2942601 (Word) Document: 2956329 (Pdf)

March 2022

# **Executive summary**

Taranaki Thoroughbred Racing (TTR) owns and operates the Pukekura Raceway located on Coronation Avenue, New Plymouth. The site is located within the Te Henui catchment and forms part of the eastern boundary of Pukekura Park.

#### During the monitoring period TTR demonstrated an overall high level of environmental performance.

TTR hold resource consent 7470-1.2 which authorises the take and use of groundwater from a bore for watering of racetracks and general purposes, at the Taranaki Thoroughbred Racing Club, as well as watering gardens and other general purposes at Pukekura Park. The consent was issued by the Taranaki Regional Council (the Council) on 20 June 2017 and contains nine special conditions which set out the requirements that TTR must satisfy. The consent has a maximum abstraction limit of 500 m<sup>3</sup>/day.

This report for the period July 2020 to June 2021 describes the monitoring programme carried out by the Council to assess TTR's environmental performance and level of compliance with consent 7470-1.2.

To monitor the exercising of consent 7470-1.2, abstraction volume and rate data are recorded electronically and transferred to the Council via telemetry, so the data can be viewed in near real time.

Two groundwater monitoring bores are monitored to assess the potential effects of the abstraction on local groundwater levels. Groundwater levels are monitored electronically by pressure transducers, programmed to record measurements at 30 minute intervals.

Two inspection visits to the site were also carried out in the year under review.

Data collected via the Council's monitoring programme indicated that there have been no significant impacts to the groundwater system from the authorised abstraction.

There were no unauthorised incidents recording non-compliance in respect of this consent holder during the period under review.

During the year, TTR demonstrated a high level of environmental and administrative performance with the resource consent.

For reference, in the 2020-2021 year, consent holders were found to achieve a high level of environmental performance and compliance for 86% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 11% of the consents, a good level of environmental performance and compliance was achieved.

In terms of overall environmental and compliance performance by TTR over the last several years, this report shows that TTR's performance continues at a high level.

This report includes recommendations to be implemented during the 2021-2022 monitoring period.

# **Table of contents**

				Page
1		Introduct	ion	1
	1.1	Compli	ance monitoring programme reports and the Resource Management Act 1991	1
		1.1.1	Introduction	1
		1.1.2	Structure of this report	1
		1.1.3	The Resource Management Act 1991 and monitoring	1
		1.1.4	Evaluation of environmental and administrative performance	2
	1.2	Backgr	ound	3
	1.3	Resour	ce consents	4
	1.4	Monito	ring Programme	6
		1.4.1	Introduction	6
		1.4.2	Programme liaison and management	6
		1.4.3	Site inspections	6
		1.4.4	Monitoring and review of abstraction data	6
		1.4.5	Monitoring and review of groundwater level data	6
2		Results		7
	2.1	Inspect	ions	7
	2.2	Provisio	on of consent holder data	7
	2.3	Results	of abstraction monitoring	7
	2.4	Results	of groundwater monitoring	9
	2.5	Investi	gations, interventions, and incidents	12
3		Discussio	on .	13
	3.1	Discuss	sion of site performance	13
	3.2	Enviror	nmental effects of exercise of consent	13
	3.3	Evaluat	ion of performance	14
	3.4	Recom	mendations from the 2019-2020 Annual Report	15
	3.5	Alterati	ions to monitoring programmes for 2021-2022	15
4		Recomm	endations	16
Gloss	ary of	common te	erms and abbreviations	17
Biblic	graphy	and refere	ences	18

Appendix I Resource consents held by Taranaki Thoroughbred Racing

# List of tables

Table 1	Abstraction and monitoring bore details	4
Table 2	Summary of historical abstraction activity	7
Table 3	Summary of performance for consent 7470-1.2	14
Table 4	Evaluation of environmental performance over time	15
	List of figures	
Figure 1	Location of TTR abstraction bore and monitoring bores	5
Figure 2	Daily abstraction volumes under consent 7470-1.2 (July 2020-June 2021)	8
Figure 3	Daily abstraction volumes under consent 7470-1.2 (2009-2021)	8
Figure 4	Observed groundwater levels GND2102 and rainfall (July 2020-June 2021)	9
Figure 5	Observed groundwater levels GND2102 and abstraction (July 2020-June 2021)	10
Figure 6	Observed groundwater levels GND2103 and rainfall (July 2020-June 2021)	10
Figure 7	Observed groundwater levels GND2103 and abstraction (July 2020-June 2021)	11
Figure 8	Historical groundwater level response and abstraction (2009-2021)	11

# 1 Introduction

# 1.1 Compliance monitoring programme reports and the Resource Management Act 1991

#### 1.1.1 Introduction

This report is for the period July 2020 to June 2021 by the Taranaki Regional Council (the Council) on the monitoring programme associated with the resource consent held by Taranaki Thoroughbred Racing (TTR). TTR operates a race track and associated facilities on Coronation Avenue, New Plymouth. The site is located within the Te Henui catchment. Consent 7470-1.2 authorises the abstraction of up to 500 m³/day of groundwater from an abstraction bore at the site, at a rate not exceeding 10 L/s.

The report includes the results and findings of the monitoring programme implemented by the Council in respect of the consent held by TTR for the abstraction of groundwater and also discusses the environmental effects of TTR's use of groundwater. This is the eighth monitoring programme report by the Council for TTR.

This will be the final individual compliance report related to Consent 7470-1.2 as activities related to the consent will be included in the Council's minor water take compliance monitoring programme from 1 July 2021.

## 1.1.2 Structure of this report

Section 1 of this report is a background section. It sets out general information about:

- consent compliance monitoring under the Resource Management Act 1991 (RMA) and the Council's obligations;
- the Council's approach to monitoring sites though annual programmes;
- the resource consent held by TTR to take and use groundwater;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted by TTR.

**Section 2** presents the results of monitoring during the period under review, including scientific and technical data.

Section 3 discusses the results, their interpretations, and their significance for the environment.

Section 4 presents recommendations to be implemented in the 2021-2022 monitoring year.

A glossary of common abbreviations and scientific terms, and a bibliography, are presented at the end of the report.

## 1.1.3 The Resource Management Act 1991 and monitoring

The RMA primarily addresses environmental 'effects' which are defined as positive or adverse, temporary or permanent, past, present or future, or cumulative. Effects may arise in relation to:

- a. the neighbourhood or the wider community around an activity, and may include cultural and social-economic effects;
- b. physical effects on the locality, including landscape, amenity and visual effects;
- c. ecosystems, including effects on plants, animals, or habitats, whether aquatic or terrestrial;
- d. natural and physical resources having special significance (for example recreational, cultural, or aesthetic); and

e. risks to the neighbourhood or environment.

In drafting and reviewing conditions on discharge permits, and in implementing monitoring programmes, the Council is recognising the comprehensive meaning of 'effects' inasmuch as is appropriate for each activity. Monitoring programmes are not only based on existing permit conditions, but also on the obligations of the RMA to assess the effects of the exercise of consents. In accordance with Section 35 of the RMA, the Council undertakes compliance monitoring for consents and rules in regional plans, and maintains an overview of the performance of resource users and consent holders. Compliance monitoring, including both activity and impact monitoring, enables the Council to continually re-evaluate its approach and that of consent holders to resource management and, ultimately, through the refinement of methods and considered responsible resource utilisation, to move closer to achieving sustainable development of the region's resources.

## 1.1.4 Evaluation of environmental and administrative performance

Besides discussing the various details of the performance and extent of compliance by the consent holder, this report also assigns them a rating for their environmental and administrative performance during the period under review.

Environmental performance is concerned with <u>actual or likely effects</u> on the receiving environment from the activities during the monitoring year. Administrative performance is concerned with the consent holder's approach to demonstrating consent compliance <u>in site operations and management</u> including the timely provision of information to Council (such as contingency plans and water take data) in accordance with consent conditions.

Events that were beyond the control of the consent holder <u>and</u> unforeseeable (that is a defence under the provisions of the RMA can be established) may be excluded with regard to the performance rating applied. For example loss of data due to a flood destroying deployed field equipment.

The categories used by the Council for this monitoring period, and their interpretation, are as follows:

#### **Environmental Performance**

**High:** No or inconsequential (short-term duration, less than minor in severity) breaches of consent or regional plan parameters resulting from the activity; no adverse effects of significance noted or likely in the receiving environment. The Council did not record any verified unauthorised incidents involving environmental impacts and was not obliged to issue any abatement notices or infringement notices in relation to such impacts.

**Good:** Likely or actual adverse effects of activities on the receiving environment were negligible or minor at most. There were some such issues noted during monitoring, from self reports, or during investigations of incidents reported to the Council by a third party but these items were not critical, and follow-up inspections showed they have been dealt with. These minor issues were resolved positively, co-operatively, and quickly. The Council was not obliged to issue any abatement notices or infringement notices in relation to the minor non-compliant effects; however abatement notices may have been issued to mitigate an identified potential for an environmental effect to occur.

For example:

- High suspended solid values recorded in discharge samples, however the discharge was to land or to receiving waters that were in high flow at the time;
- Strong odour beyond boundary but no residential properties or other recipient nearby.

**Improvement required**: Likely or actual adverse effects of activities on the receiving environment were more than minor, but not substantial. There were some issues noted during monitoring, from self

reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent minor non-compliant activity could elevate a minor issue to this level. Abatement notices and infringement notices may have been issued in respect of effects.

**Poor:** Likely or actual adverse effects of activities on the receiving environment were significant. There were some items noted during monitoring, from self reports, or during investigations of incidents reported to the Council by a third party. Cumulative adverse effects of a persistent moderate non-compliant activity could elevate an 'improvement required' issue to this level. Typically there were grounds for either a prosecution or an infringement notice in respect of effects.

#### Administrative performance

**High:** The administrative requirements of the resource consents were met, or any failure to do this had trivial consequences and were addressed promptly and co-operatively.

**Good:** Perhaps some administrative requirements of the resource consents were not met at a particular time, however this was addressed without repeated interventions from the Council staff. Alternatively adequate reason was provided for matters such as the no or late provision of information, interpretation of 'best practical option' for avoiding potential effects, etc.

**Improvement required:** Repeated interventions to meet the administrative requirements of the resource consents were made by Council staff. These matters took some time to resolve, or remained unresolved at the end of the period under review. The Council may have issued an abatement notice to attain compliance.

**Poor:** Material failings to meet the administrative requirements of the resource consents. Significant intervention by the Council was required. Typically there were grounds for an infringement notice.

For reference, in the 2020-2021 year, consent holders were found to achieve a high level of environmental performance and compliance for 86% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 11% of the consents, a good level of environmental performance and compliance was achieved.<sup>1</sup>

# 1.2 Background

The abstraction bore (GND2010) operated by TTR was installed in March 2009 and is located to the south of the main race track approximately 40 m from the site's boundary with Pukekura Park (Figure 1).

The geological log of the bore indicates that volcanic sand and gravel layers interbedded with peat horizons occur to a depth of 86 m below the site. The bore was constructed using PVC casing to 62 m and completed using alternating 150 mm stainless steel spacers and 178 mm diameter stainless steel screen from 62 m to 83 m. The combined screen length totalled 12 m and the bore was designed to intercept three separate gravel aguifer intervals.

To enable a robust groundwater level monitoring programme to be undertaken, given the close proximity of the abstraction to Pukekura Park, three groundwater monitoring bores (GND2102 – GND2104) were also constructed using 50 mm PVC to monitor the site. During 2016 an additional monitoring bore GND2119, located within the Park boundary was added and GND2104 was removed from the programme. GND2119 was added to enable closer monitoring of the shallow groundwater table within the Park. GND2104 was removed after extensive searches undertaken by TTR, New Plymouth District Council (NPDC) and the

<sup>&</sup>lt;sup>1</sup> The Council has used these compliance grading criteria for more than 17 years. They align closely with the 4 compliance grades in the MfE Best Practice Guidelines for Compliance, Monitoring and Enforcement, 2018

Council failed to locate the bore. All parties agreed the bore was no longer accessible for monitoring and was likely buried during previous site works at the race course. GND2119 has also now been removed from the programme following failure of the groundwater level logger. Bore details for the abstraction bore and remaining monitoring bores are summarised in Table 1.

Table 1 Abstraction and monitoring bore details

Site code	reference	Coordina	tes (NZTM)	Date constructed	Bore diameter	Drilled depth	Bore depth	Screened depth
		Eastings	Northings		mm	m	m BGL	m BGL
GND2010	TRC1	1693946	5675085	31/03/2009	200	131	98	62-83
GND2102	PMB1	1693939	5675090	15/04/2009	50	28.5	27	24-27
GND2103	PMB2	1693940	5675072	15/04/2009	50	78	76	66-76
GND2119	MW5	1693784	5675148	25/09/2009	50	4.2	4.2	1.1-4.2

# 1.3 Resource consents

TTR hold one resource consent the details of which are summarised in the table below. Summaries of the conditions attached to the permit are set out in Section 3 of this report. Version 7470-1.2 of the consent expired during the previous monitoring period on 1 June 2020. An application to renew the consent was received on 27 November 2019. As the application was received prior to consent expiry TTR were authorised to continue operation under the expired consent until the replacement consent was processed. The replacement consent was granted on 13 September 2021.

A summary of the various consent types issued by the Council is included in Appendix I, as is a copy of the permit held by TTR during the period under review.

Consent number	Purpose	Granted	Review	Expires
7470-1.2	To take and use groundwater from a bore for watering of racing tracks and general purposes at	20 Aug 2009	No reviews remaining	1 Jun 2020
7470-2.1	the Taranaki Thoroughbred Racing Club, and filling of water tanks for watering of Councilowned gardens within New Plymouth District, and other general purposes within Pukekura Park	13 Sep 2021	Jun 2023	1 Jun 2038

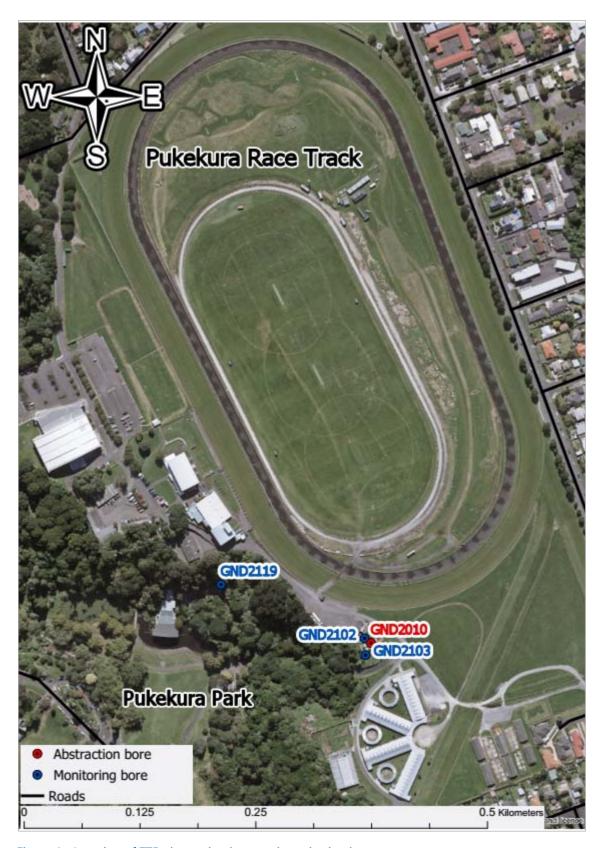


Figure 1 Location of TTR abstraction bore and monitoring bores

# 1.4 Monitoring Programme

#### 1.4.1 Introduction

Section 35 of the RMA sets obligations upon the Council to gather information, monitor and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations and seek information from consent holders.

The monitoring programme for the TTR site consisted of four primary components.

# 1.4.2 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- in discussion over monitoring requirements;
- · preparation for any consent reviews, renewals or new consent applications;
- advice on the Council's environmental management strategies and content of regional plans; and
- consultation on associated matters.

## 1.4.3 Site inspections

The TTR site is visited twice during the monitoring period for the purpose of undertaking inspections. A typical inspection visit includes:

- obtaining static water level measurements from the abstraction bore and monitoring bores;
- taking instantaneous abstraction volume and rate readings from the abstraction bore flow meter;
- taking instantaneous abstraction volume and rate readings from the datalogger display for comparison with flow meter readings;
- downloading electronic abstraction and groundwater level data; and
- carrying out a general visual inspection of the abstraction bore and monitoring bore headworks, pipework and groundwater storage infrastructure.

## 1.4.4 Monitoring and review of abstraction data

The volume and rate of abstraction from GND2010 is recorded electronically on a data logging unit and transferred to the Council via telemetry. In order to assess compliance with the special conditions of consent 7470-1.2, a review of all abstraction data is carried out for comparison against stipulated limits. All data needs to be processed and checked for accuracy before any analysis can be carried out. All data is then provided to NPDC as per consent condition requirements.

# 1.4.5 Monitoring and review of groundwater level data

Groundwater levels are monitored to assess the effects of the abstraction authorised under resource consent 7470-1.2 on the local groundwater system. Groundwater levels were measured manually in the monitoring bores during inspection visits. Pressure transducers are installed in monitoring bores GND2102 and GND2103. In addition, an atmospheric logger is also installed to measure and record barometric pressure. The electronic data is downloaded by Council Officers during inspection visits.

# 2 Results

# 2.1 Inspections

During the period under review two inspection visits were carried out in relation to the consent. Inspections were undertaken on 31 July 2020 and 26 February 2021.

No issues were noted by the inspecting officer during either site visit.

## 2.2 Provision of consent holder data

Abstraction data was provided directly to the Council via the onsite telemetry system. Groundwater levels were recorded at the required interval by in-situ level loggers which were downloaded by a Council Officer during biannual inspections. All data was received within consented timeframes.

# 2.3 Results of abstraction monitoring

Consent 7470-1.2 stipulates an abstraction volume limit of 500 m<sup>3</sup>/day and a maximum abstraction rate of 10 L/s. The daily abstraction volume for the period under review are presented in Figure 2. The daily abstraction volume for the period August 2009 to June 2021 are presented in Figure 3. The maximum abstraction rate and maximum abstraction volume were not exceeded during the monitoring period.

Total abstraction for the 2020-2021 monitoring period was 20,649 m³. This is a slight decrease from the previous monitoring period. Abstraction at the site is required to supplement rainfall consequently more water is abstracted during drier years than wetter years. The annual volume abstracted since 2009 is included below in Table 2. Abstraction at the site is low when compared to the 500 m³ per day limit. The high daily abstraction volume was granted to enable TTR to supplement Pukekura Park if required without causing a breach of consent conditions.

Table 2 Summary of historical abstraction activity

Period	Total volume abstracted (m <sup>3</sup> )	Period	Total volume abstracted (m <sup>3</sup> )
2020-2021	20,649	2014-2015	24,952
2019-2020	22,955	2013-2014	19,361
2018-2019	20,065	2012-2013	21,099
2017-2018	17,780	2011-2012	16,663
2016-2017	10,491	2010-2011	17,666
2015-2016	20,801	2009-2010	14,618

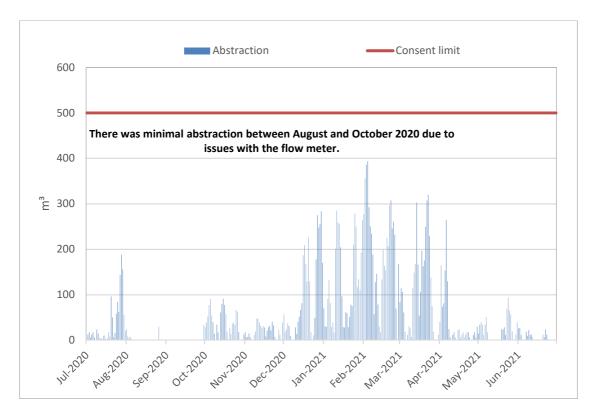


Figure 2 Daily abstraction volumes under consent 7470-1.2 (July 2020-June 2021)

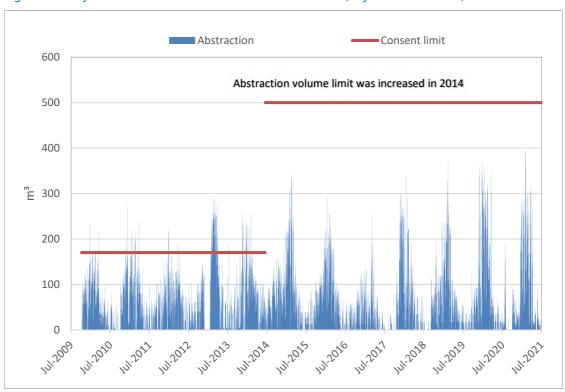


Figure 3 Daily abstraction volumes under consent 7470-1.2 (2009-2021)

# 2.4 Results of groundwater monitoring

The groundwater level data for GND2102 and the daily rainfall values from the Brooklands Zoo rainfall station are presented in Figure 4. The rainfall station is located approximately 350 m south west of the site and came into operation in July 2013. The groundwater level and daily abstraction data are plotted in Figure 5. Groundwater level data for the review period for GND2103 is presented alongside rainfall in Figure 6 and abstraction in Figure 7.

Groundwater levels respond to rainfall in the shallow bore GND2102. There does not appear to be a significant response to abstraction in the bore, however due to the masking effects of the strong seasonal response seen in the bore any subdued effects would be difficult to determine. In contrast a significant response to abstraction can be seen in GND2103 which is screened in the same aquifer interval as the abstraction bore GND2010.

A pressure transducer was also previously installed in GND2119 located within the Park boundary until recently when it was removed following failure of the equipment. As there have been no measurable impacts to the park to date the transducer was not replaced and the bore was removed from the monitoring programme. Maintaining operation of the transducer is not a requirement of TTR's water take consent.

The long term groundwater level and abstraction data is presented in Figure 8. The data indicates that groundwater levels in all three bores fluctuate to varying degrees over the monitoring year and that there have been no significant long term changes in groundwater levels since monitoring commenced.

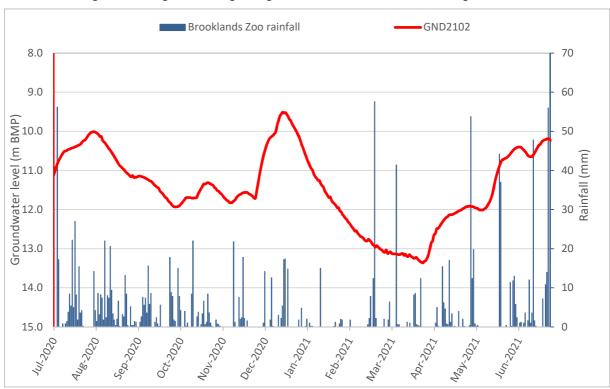


Figure 4 Observed groundwater levels GND2102 and rainfall (July 2020-June 2021)

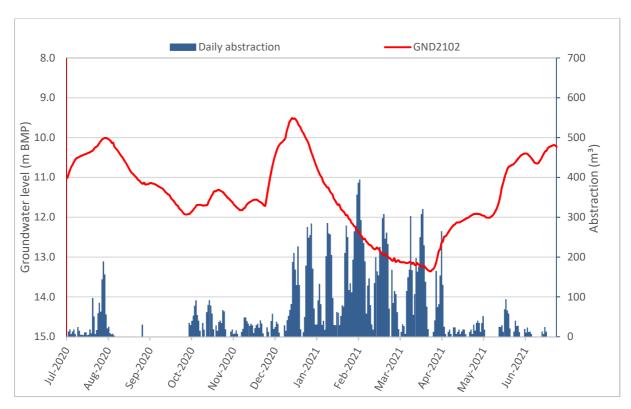


Figure 5 Observed groundwater levels GND2102 and abstraction (July 2020-June 2021)

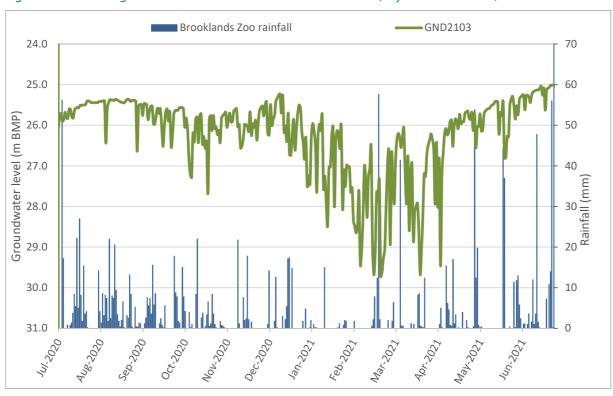


Figure 6 Observed groundwater levels GND2103 and rainfall (July 2020-June 2021)

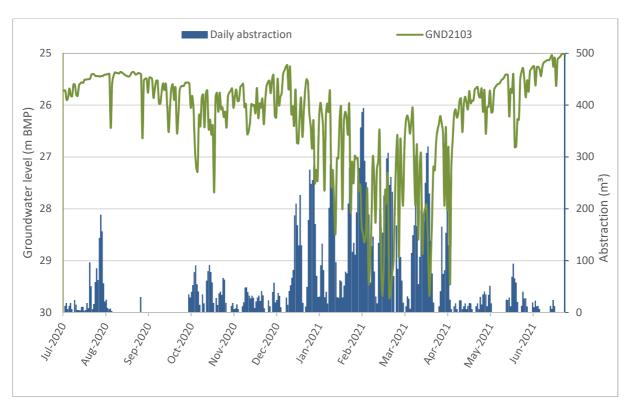


Figure 7 Observed groundwater levels GND2103 and abstraction (July 2020-June 2021)

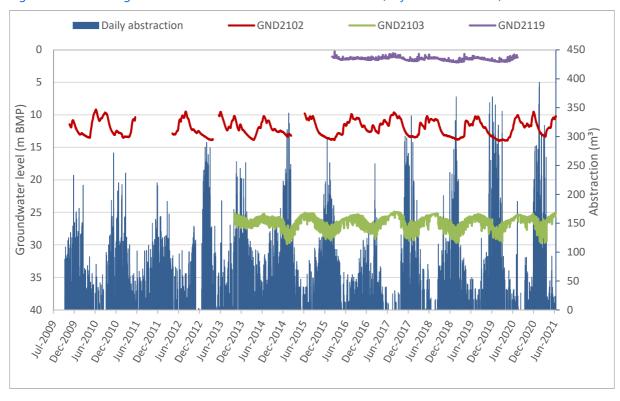


Figure 8 Historical groundwater level response and abstraction (2009-2021)

# 2.5 Investigations, interventions, and incidents

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with TTR. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of potential or actual causes of non-compliance or failure to maintain good practices. A pro-active approach, that in the first instance avoids issues occurring, is favoured.

For all significant compliance issues, as well as complaints from the public, the Council maintains a database record. The record includes events where the individual/organisation concerned has itself notified the Council. Details of any investigation and corrective action taken are recorded for non-compliant events.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified individual/organisation is indeed the source of the incident (or that the allegation cannot be proven).

In the 2020-2021 period, the Council was not required to undertake significant additional investigations and interventions, or record incidents, in association with the conditions in TTR's resource consent or provisions in Regional Plans.

# 3 Discussion

# 3.1 Discussion of site performance

During the period under review, TTR exercised one consent for the abstraction of groundwater from a bore for watering of race tracks and general purposes, at the Taranaki Thoroughbred Racing Club, as well as watering gardens and other general purposes at Pukekura Park.

Inspections of the site conducted during the period under review found the site to be in good condition and being well managed. The monitoring equipment installed at the site was found to be secure and operating correctly. Between August and October 2021 TTR reported that the flowmeter was out of commission for several weeks and that the bore was not being utilised. All data required to be submitted under the relevant consent conditions was either transmitted directly to the Council or collected at the required intervals by a Council Officer on behalf of TTR.

## 3.2 Environmental effects of exercise of consent

The main potential environmental effect of a groundwater abstraction is the reduction in groundwater levels in the vicinity of the abstraction bore. Depending on the local hydrogeological characteristics, the lowering of groundwater levels could reduce the volume of water available for abstraction by other existing groundwater users, or reduce baseflow to groundwater fed surface water systems.

The primary concern associated with a reduction in groundwater levels as a result of the abstraction from GND2010 is the reduction in groundwater flow to springs and surface water systems within Pukekura Park.

Monitoring results during the 2014-2015 period, indicated there may be some connectivity between the shallow and deeper aquifers during times of heavy abstraction. The main factor influencing groundwater level fluctuations in GND2102 is rainfall recharge with groundwater levels displaying seasonal trends typical of shallow bores screened within the volcanics formation. The trend is consistent with historical trends in this bore and indicates there has been no long term impact to groundwater levels as a result of the authorised abstraction.

During the period under review, groundwater levels measured within monitoring bore GND2103 varied in response to abstraction from GND2010. When abstraction volumes increase over the summer months the groundwater levels fall in response and during the winter months, when abstraction decreases, the groundwater levels recover.

In summary, groundwater level monitoring data gathered by the Council does not indicate any long-term reduction in shallow or deep groundwater levels as a result of the abstraction authorised by consent 7470-1.2. As such, the potential for adverse effects on down gradient surface water systems as a result of the abstraction is deemed negligible, but will continue to be monitored under the minor water takes programme.

Compliance with the conditions of TTR's consent during the 2020-2021 monitoring period is summarised below in Section 3.3.

# 3.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Table 3.

Table 3 Summary of performance for consent 7470-1.

Purpose: To take and use groundwater from a bore for watering of racing tracks and general purposes at the Taranaki Thoroughbred Racing Club, and filling of water tanks for watering of NPDC-owned gardens and other general purposes within Pukekura Park.

	Condition requirement	Means of monitoring during period under review	Compliance achieved?
1.	Limits of discharge rates and volumes	Monitoring of take and data review	Yes
2.	Installation of water meter and datalogger	Inspection	Yes
3.	Measurements made in accordance with condition 2 shall be transmitted to the Council's computer system in real time	Receipt of electronic data at required frequency and in correct format	Yes
4.	Bore label to be attached	Inspection	Yes
5.	Continuous record of water level to be maintained in observation bores GND2102 and GND2103	Inspection and assessment of monitoring data	Yes
6.	Data collected accordance with special conditions 2 & 5 to be submitted to NPDC	Notification of data received from NPDC	Yes
7.	Adopt best practicable option	Inspection and liaison with consent holder	Yes
8.	Lapse clause	Consent exercised prior to 30 September 2014	Yes
9.	Review provision	No longer applicable	N/A
of t	this consent	pliance and environmental performance in respect	High High

Table 4 Evaluation of environmental performance over time

Year	Consent number	High	Good	Improvement required	Poor
2020-2021		1	-	-	-
2019-2020		1	-	-	-
2018-2019		1	-	-	-
2017-2018		1	-	-	-
2016-2017		1	-	-	-
2015-2016	7470	1	-	-	-
2014-2015		1	-	-	-
2013-2014		1	-	-	-
2009-2013		-	-	1	-
Totals		7	-	1	-

During the year, TTR demonstrated a high level of environmental and high level of administrative performance with the resource consent as defined in Section 1.1.4.

# 3.4 Recommendations from the 2019-2020 Annual Report

In the 2019-2020 Annual Report, it was recommended:

- 1. THAT in the first instance, monitoring of consented activities in the 2020-2021 year continue at the same level as in 2019-2020.
- 2. THAT should there be issues with environmental or administrative performance in 2020-2021, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

The recommendations above were implemented during the period under review.

# 3.5 Alterations to monitoring programmes for 2021-2022

In designing and implementing the monitoring programmes for air/water discharges in the region, the Council has taken into account:

- the extent of information already made available through monitoring or other means to date;
- its relevance under the RMA;
- the Council's obligations to monitor consented activities and their effects under the RMA;
- the record of administrative and environmental performances of the consent holder; and
- reporting to the regional community.

The Council also takes into account the scope of assessments required at the time of renewal of permits, and the need to maintain a sound understanding of industrial processes within Taranaki exercising resource consents.

It is proposed the range of monitoring carried out during the 2020-2021 period be continued during the 2021-2022 monitoring period. Recommendations to this effect are included in Section 4 of this report.

It should be noted that the proposed programme represents a reasonable and risk-based level of monitoring for the site(s) in question. The Council reserves the right to subsequently adjust the programme from that initially prepared, should the need arise if potential or actual non-compliance is determined at any time during 2021-2022.

# 4 Recommendations

- 1. THAT in the first instance, monitoring of consented activities in the 2021-2022 year continue at the same level as in 2020-2021.
- 2. THAT should there be issues with environmental or administrative performance in 2021-2022, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

# Glossary of common terms and abbreviations

The following abbreviations and terms may be used within this report:

Aquifer (freshwater) A formation, or group or part of a formation that contains sufficient saturated

permeable media to yield exploitable quantities of fresh water.

Incident An event that is alleged or is found to have occurred that may have actual or potential

environmental consequences or may involve non-compliance with a consent or rule in a regional plan. Registration of an incident by the Council does not automatically

mean such an outcome had actually occurred.

Intervention Action/s taken by Council to instruct or direct actions be taken to avoid or reduce the

likelihood of an incident occurring.

Investigation Action taken by Council to establish what were the circumstances/events surrounding

an incident including any allegations of an incident.

IR Unauthorised Incident Register – contains a list of events recorded by the Council on

the basis that they may have the potential or actual environmental consequences that

may represent a breach of a consent or provision in a Regional Plan.

Observation bore A bore drilled in a selected location for the purpose of observing parameters such as

fluid levels and pressure changes as abstraction proceeds.

Abstraction bore A bore used to retrieve groundwater from an aquifer for the purposes of water supply

for consumptive or irrigation purposes.

Pump test A pump test (or aquifer test) is conducted to evaluate an aquifer by stimulating the

aquifer through constant pumping, and observing the aquifer's response (drawdown) in observation bores. Aquifer testing is a common tool that hydrogeologists use to

characterise aquifer systems and determine aquifer properties.

L/s Litres per second.

m BGL Metres below ground level.
m TVD Metres true vertical depth

m<sup>3</sup> Cubic metre.

Resource consent Refer Section 87 of the RMA. Resource consents include land use consents (refer

Sections 9 and 13 of the RMA), coastal permits (Sections 12, 14 and 15), water permits

(Section 14) and discharge permits (Section 15).

RMA Resource Management Act 1991 and including all subsequent amendments.

UI Unauthorised Incident.

For further information on analytical methods, contact a Science Services Manager.

# Bibliography and references

- BECA (2009): Taranaki Thoroughbred Racing Groundwater Well. Technical Report. TRC doc.621284.
- Geosearch Limited (2014): Assessment of effect for application to change the conditions of consent 7470.
- Ministry for the Environment. 2018. Best Practice Guidelines for Compliance, Monitoring and Enforcement under the Resource Management Act 1991. Wellington: Ministry for the Environment.
- Stevens G. (2001): Taranaki in: Groundwaters of New Zealand, M.R, Rosen and P.A. White (eds). New Zealand Hydrological Society Inc., Wellington. P381-386.
- Taranaki Regional Council (2017): Officers Report Consent Application 7470-1.2. TRC doc. 1856215.
- Taranaki Regional Council (2013): Officers Report Consent Application 7470-1.1. TRC doc. 1352092.
- Taranaki Regional Council (2009): Officers Report Consent Application 7470-1. TRC doc. 621297.
- Taranaki Regional Council (2022): Taranaki Thoroughbred Racing Monitoring Programme Annual Report 20-2019-2020. Technical Report 2020-85. Doc.id. 2497196.
- Taranaki Regional Council (2020): Taranaki Thoroughbred Racing Monitoring Programme Annual Report 2018-2019. Technical Report 2019-74. Doc.id. 2361997.
- Taranaki Regional Council (2019): Taranaki Thoroughbred Racing Monitoring Programme Annual Report 2017-2018. Technical Report 2018-89. Doc.id. 2156039.
- Taranaki Regional Council (2018): Taranaki Thoroughbred Racing Monitoring Programme Annual Report 2016-2017. Technical Report 2017-28. Doc.id. 1866480.
- Taranaki Regional Council (2017): Taranaki Thoroughbred Racing Groundwater Abstraction Monitoring Programme Report 2015-2016. Technical Report 2016-63. Doc.id. 1751351.
- Taranaki Regional Council (2016): Taranaki Thoroughbred Racing Groundwater Abstraction Monitoring Programme Report 2014-2015. Technical Report 2015-87. Doc.id. 1584175.
- Taranaki Regional Council (2015): Taranaki Thoroughbred Racing Groundwater Abstraction Monitoring Programme Report 2013-2014. Technical Report 2014-119. Doc. id. 1516927.
- Taranaki Regional Council (2014): Taranaki Racing Club Groundwater Abstraction Monitoring Programme Report 2009-2013. Technical Report 2013-71. Doc.id. 1277802.

# Appendix I

# Resource consents held by Taranaki Thoroughbred Racing

(For a copy of the signed resource consent please contact the TRC Consents department)

#### Water abstraction permits

Section 14 of the RMA stipulates that no person may take, use, dam or divert any water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or it falls within some particular categories set out in Section 14. Permits authorising the abstraction of water are issued by the Council under Section 87(d) of the RMA.

#### Water discharge permits

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations. Permits authorising discharges to water are issued by the Council under Section 87(e) of the RMA.

#### Air discharge permits

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising discharges to air are issued by the Council under Section 87(e) of the RMA.

## Discharges of wastes to land

Sections 15(1)(b) and (d) of the RMA stipulate that no person may discharge any contaminant onto land if it may then enter water, or from any industrial or trade premises onto land under any circumstances, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising the discharge of wastes to land are issued by the Council under Section 87(e) of the RMA.

#### Land use permits

Section 13(1)(a) of the RMA stipulates that no person may in relation to the bed of any lake or river use, erect, reconstruct, place, alter, extend, remove, or demolish any structure or part of any structure in, on, under, or over the bed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Land use permits are issued by the Council under Section 87(a) of the RMA.

#### Coastal permits

Section 12(1)(b) of the RMA stipulates that no person may erect, reconstruct, place, alter, extend, remove, or demolish any structure that is fixed in, on, under, or over any foreshore or seabed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Coastal permits are issued by the Council under Section 87(c) of the RMA.



# Water Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of

Taranaki Racing Inc

Consent Holder:

Decision Date:

13 September 2021

Commencement Date:

13 September 2021

## **Conditions of Consent**

Consent Granted: To take and use groundwater from a bore for watering of

racing tracks and general purposes at the Taranaki Thoroughbred Racing Club, and filling of water tanks for watering of Council-owned gardens within New Plymouth District, and other general purposes within Pukekura Park

Expiry Date: 1 June 2038

Review Date(s): June 2023 and 3-yearly thereafter

Site Location: 130 Coronation Ave, Welbourn

Grid Reference (NZTM) 1693950E-5675089N

Catchment: Huatoki

For General, Standard and Special conditions pertaining to this consent please see reverse side of this document

Page 1 of 3

#### **General condition**

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

# **Special conditions**

- 1. The rate of taking shall not 10 litres per second.
- 2. Except as provided for by condition 3 the volume of water taken during any 24 hour period ending at midnight shall not exceed 400 m3.
- 3. The volume of water taken may exceed the amount specified in condition 2 only if all the following conditions apply:
  - (a) There are extremely dry climatic conditions;
  - (b) As a consequence of the dry climatic conditions there is a risk of injury to horses and riders from very hard track conditions;
  - (c) As a consequence of the dry climatic conditions dust blowing from the track is causing, or may cause, a hazard for neighbours;
  - (d) Using the water taken to mitigate the effects described in (b) and (c) above is given priority over other uses;
  - (e) In spite of using water as described in (d) above the effects described in (b) and (c) are not adequately mitigated;
  - (f) The volume taken during any 24 hour period ending at midnight does not exceed 500 m³; and
  - (g) Within 20 working days of water being taken in accordance with this condition the consent holder shall provide a report to the Chief Executive, Taranaki Regional Council demonstrating that the conditions described in (a) to (e) have all been met.
- 4. The amount of water taken shall be measured and recorded in accordance with the *Resource Management (Measurement and Reporting of Water Takes) Regulations* 2010.
- 5. The bore shall be easily identifiable by a permanent label, which may be welded or engraved on the casing, or on the equivalent fixed part of the well construction or associated building. The numbering on the label shall be the bore number assigned by Taranaki Regional Council, which is GND2010.
- 6. The consent holder shall ensure that a continuous record of the groundwater level in a shallow and deep groundwater observation wells GND2102 (the Council-PMB1) and GND2103 (the Council-PMB2) is maintained. This shall be achieved by installing an automatic water level recording device on each well that records the water level at intervals not exceeding 30 minutes to an accuracy of  $\pm$  5 mm and is tamper-proof. The cost of establishing and operating the recorder shall be met by the consent holder.
- 7. Water level data collected in accordance with condition 6 above, and records of water taken collected in accordance with condition 4, shall be provided to New Plymouth District Council biannually.

#### Consent 7470-2.1

- 8. At all times the consent holder shall adopt the best practicable option to prevent or minimise any actual or likely adverse effect on the environment associated with the abstraction of groundwater, including, but not limited to, the efficient and conservative use of water.
- 9. If any measuring or recording equipment breaks down, or for any reason is not operational, the consent holder shall advise the Chief Executive, Taranaki Regional Council immediately. Any repairs or maintenance to this equipment must be undertaken by a suitably qualified person.
- 10. The water measuring and recording equipment shall be accessible to Taranaki Regional Council officers at all reasonable times for inspection and/or data retrieval.
- 11. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month June 2023 and at 3-yearly intervals thereafter for either or both of the following purposes:

Signed at Stratford on 13 September 2021

For and on behalf of Taranaki Regional Council

A D McLay

**Director - Resource Management**