

## **National Policy Statement for Freshwater Management**

1.1 Ours is a combined submission by groups representing Oakley and Meola streams, two of the five public urban waterways in Auckland. Pat Prescott and Elizabeth Walker are the Chair and Deputy Chair of STEPS, and Wendy John is the Chair of Friends of Oakley Creek.

1.2 We contend these streams are of significant ecological, environmental and historic significance and require recognition as of notable value within the Auckland city region. Both support populations of native flora and fauna, and are used for recreation including swimming. Both include riparian margins with biosecurity significance. Oakley creek includes Auckland's only waterfall, and has been identified by the Environment Court Commissioner as “... *the most significant urban watercourse in Auckland City ...*”

1.3 The Meola creek catchment receives approximately half the volume of all Watercare Services Auckland overflows. The western isthmus streams - Meola, Oakley and Motions combined handle about 84% of Watercare overflows. They are of notable value to the environment of the region including use to dilute pollution before harbour discharge.

2.1 We contend the ecological status of both Meola and Oakley creeks as freshwater resources are at risk from cumulative demand, and their expanding use as part of the city's stormwater and wastewater infrastructure.

2.2 Significant cumulative demand on the catchments' freshwater supply includes Three Kings quarry, where water is diverted from the Meola and Oakley aquifer to Onehunga/ Manukau – thus removing freshwater which would otherwise be available to improve the flows and health of these catchments. Three Kings/ Western Springs/ Meola/ Oakley aquifer represents a notable freshwater resource.

2.3 Significant ecological stress and risk results from the use of Meola and Oakley creeks as stormwater and wastewater utilities. Further risks are added from the planned expansion of the St Lukes town centre, and illustrate significant water revenue sold without coordinated provision of waste and stormwater infrastructure. We contend the Meola catchment including Meola reef and Waitemata Harbour are degraded by its use as an open sewer; and the proposed SH20 Waterview Connection motorway, will reduce permeable surfaces in the Oakley Creek catchment by a **further 12 hectares**.

3.1 National Policy statement for fresh water should ensure that we are looking to the needs of future generations. Fresh water is now recognized as an increasingly scarce resource, and improved standards and management are needed not only to maintain the status quo going forward, but also to enhance the quality of freshwater resources.

3.2 Integrated management of all fresh water resources, including wetlands and ground water is required.

3.3 Responsibilities: Integrated management of freshwater resources requires clearer accountability for those resources than we currently have in Auckland, as outlined in our submission. While our example may be partly solved by new Auckland Governance – similar problems are likely occur in Auckland and elsewhere in future. Local Authorities must also be required to enforce compliance. Clearly NPSFW and the RMA must be consistent with each other.

3.4 A framework for national standards is needed. Standards needed for managing rural and urban freshwater resources may differ. Urban streams are sometimes degraded – nevertheless standards are needed to protect and enhance them.

3.5 Urban creeks which do not meet NZ health standards are not acceptable. Note that in Meola Creek – while sewage is objectionable and a short term health risk –it is the accumulation of road pollutants which are poisoning the marine life in the estuaries and Waitemata Harbour [See Note 1 below]. There is a critical need to require Local Authorities to manage cumulative effects.

3.6 We advise caution regarding ‘Regional significance’ and ‘local standards’. The Auckland isthmus is a unique and fragile landscape, as recognized by heritage protection of volcanic cones. Springs and aquifers are an integral part of this landscape. The definition of regional significance cannot be used to mean that clean water is required in Hunua and Waitakere; while Auckland City needs only drainage ditches, or perhaps one symbolic creek.

3.7 Standards which apply to all fresh water bodies are needed for reporting of fresh water, waste water and discharges. Ministry for the Environment should monitor reporting compliance.

3.8 Appropriate funding by Central Government is needed to ensure implementation of these policies.

3.9 Clear and robust time bound objectives and goals are needed. Targets and timeframes in the order of 5 to 10 years are required. We note that 18 years after the RMA, Auckland City Drainage System Resource Consents have still not been granted to our knowledge. We also note that an upgrade of the main sewer interceptor which has been in various local government plans since the 1970s – has not yet been built or designed.

**Note 1.**

- *Meola Integrated Catchment Management Plan Phase 2 Report – Remedial Options (Sinclair Knight Mertz 2002) states:*
- *Poor water quality in Meola Creek is a product of both waste water and storm water discharges to the creek. The main source of most bacterial and nutrient contaminants in Meola creek is from waste water discharged to the creek from overflow structures. Heavy metals and suspended solids within the creek originate primarily from storm water runoff that overflows from the combined sewer system.*
- *Measured bacterial levels were high along the whole length of Meola Creek. Levels in the upper reaches of the creek in the vicinity of MAG school exceeded the NZ guidelines for recreational body contact activities of 125 faecal coliforms and 33 enterococci.*

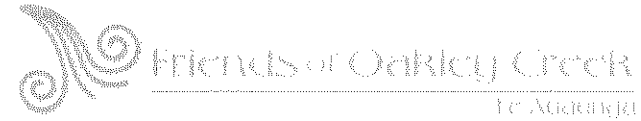
**Proposed National Policy Statement for Freshwater Management**

Item	NPS Description	STEPS and FOC view
Overall		- Issue of accountability for creeks. Example was attached in STEPS and Friends of Oakley Creek submission.
Objective 1	To ensure that Freshwater Resources are managed in a way that enables the people and communities of New Zealand to provide for their social, economic and cultural well-being, and their health and safety.	- National Policy statement on fresh water should ensure that we are looking to the needs of future generations (refer LGNZ 17.2f p46 and EDS Objective 1)
Objective 2	To ensure effective integrated management (including by the co-ordination and sequencing of Land-use Development with investment in infrastructure for supply, storage and distribution of fresh water) of	- Need to have integrated management of fresh water resources, include ground water/ aquifer (LGNZ 18.2 p47, ARC 2.8 p4) Agree with EDS – regarding fresh water going into estuaries. There are no clear boundaries between various water resources - Include infrastructure for storm water and waste water as proposed by

	the effects of Land-use Development and discharges of contaminants on the quality and available quantity of fresh water.	Metrowater and Watercare Services - Sequencing of infrastructure and land use development is critical - Support National Wetland Trust further submission in support of EBoP regarding protection of wetlands
Objective 3	To ensure the progressive enhancement of the overall quality of Freshwater Resources, including actions to ensure appropriate Freshwater Resources can reach or exceed a swimmable standard.	- Ensure that <u>all</u> fresh water is included – not just outstanding or degraded - Focus on the health and quality of streams in order to support natural life forms. Suitability for recreational contact would result - Need appropriate standards to measure water quality
Objective 4	To ensure the life supporting capacity and ecological values of Freshwater Resources are recognised and protected from inappropriate – (a) taking, use, damming or diverting of fresh water; and (b) Land-use Development; and (c) Discharges of contaminants.	- Include stronger directives to restore natural character of freshwater systems (Support National Wetland Trust further submission in support of NZ Fresh Water Sciences) - Need for recognition of riparian margins, biodiversity etc ( ARC 2.5 p3) - All streams should be protected from inappropriate activities ( Metrowater 3.3.1 p7), - Need stronger emphasis on active protection restoration of streams, e.g. Low Impact Design daylighting etc - Need Esplanade areas and strips - Need treatment of stormwater to prevent pollutants entering waterways and accumulating in estuaries and harbours
Objective 5	To control the effects of Land-use Development and discharges of contaminants to avoid further degradation of Freshwater Resources.	
Objective 6	To ensure that demands (including social, economic and cultural demands) for fresh water are sustainably managed in a manner that has regard to the following: (a) available supply of fresh water: (b) the need to provide for resilience against the biophysical effects of climate change	Support Watercare Services and LGNZ 8.6 p 33 regarding priority for domestic and municipal supply - Note that some urban streams in Auckland are already over-allocated for stormwater and waste water purposes and need ability to claw back

	(such as through infrastructure for supply, storage and distribution of fresh water): (c) the adverse effects that arise from those demands.	
Objective 7	To ensure that allocated fresh water is used efficiently particularly in terms of the following: (a) avoiding wastage: (b) avoiding excessive contamination: (c) facilitating opportunities to increase benefits from the use of fresh water.	- Support ACC request to delete word excessive in 7(b). “avoiding contamination”
Objective 8	To ensure that iwi and hapū are involved, and Tangata Whenua Values and Interests are identified and reflected, in the management of Freshwater Resources including the matters specified in Objectives 1–7.	- Support
Objective 9	To ensure that regional councils and territorial authorities undertake effective monitoring and reporting of the matters specified in Objectives 1–8.	- Support this objective and support NWT further submission in support of Wellington City’s request for appropriate guidance to ensure national consistency. - Also support EDS submission that Ministry for Environment should monitor reporting. - Disagree with ACC that it should only apply to monitoring of regionally significant fresh water. - Disagree with Metrowater and Watercare Services that local standards should be set
Policy 1		- Need guidance re notable values - Need to consider all freshwater resources not just outstanding and degraded - Agree with ACC 1(b) and 1 (h) – regarding giving “at risk“ catchments priority - Disagree with ACC 1(c) – opposition to water quality standards and environmental flows for many small freshwater streams in Auckland

**St Lukes Environmental Protection Society  
Incorporated (STEPS)**



		- Agree with NWT and Environment Canterbury – policy 1(g) - include both full flow and low flow - Standards should apply to both fresh water and discharges
Policy 2		
Policy 3		
Policy 4		
Policy 5	When preparing a district plan or variation or change to give effect to Policy 3, every territorial authority must consider the following:	
Policy 5a	(a) The importance of controlling Land-use Development in a way and at a rate that minimises the adverse effects on the quality and available quantity of Freshwater Resources:	Need to manage cumulative effects...( support ACC submission re policy 5a)
Policy 6		
Policy 7		
Policy 8		
Policy 9		
General		Agree with EDS – Need for ambitious achievable timeframes and robust goals. We would add “Protect all urban streams from any further degradation”.
Funding		Support ACC re funding and LGNZ 3.13 that it is appropriate for central government to assist by providing funding and support

*EM Waller*  
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