



**Further Submission on Proposal for National Policy Statement for  
Freshwater Management**

To: The Chairperson  
Board of Inquiry – Water  
c/o freshwaternps@mfe.govt.nz

Name of person making further submission: Ilze Gotelli  
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This is a further submission in support of, or in opposition to, submissions on the proposed National Policy Statement for Freshwater Management.

The attached table provides:

- The name and number of the submission that Metrowater either supports or opposes
- The part of the submission related to the row in the summary of submissions provided by the Ministry for the Environment
- Whether we support or oppose the part of the submission
- The reason why we support or oppose the part of the submission.

I wish to be heard in support of my submission. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

A handwritten signature in black ink, appearing to be "Ilze Gotelli", written over a horizontal line.

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Signature of submitter

8 April 2009  
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Date

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## Further Submission on the Proposed National Policy Statement for Freshwater Management

### Metrowater

Number	Name of Submitter	Section Affected	Support/Oppose	Reason
1/4	Hawke's Bay Environmental Water Group	Objective 7	Oppose	It is unrealistic to avoid all contamination, particularly in an urban environment where there is non-point source contamination from roads and buildings.
5/5	Environment Canterbury	Whole Document	Support In Part	Support the need for a precautionary approach but would be opposed to adopting an approach that is overly cautious as to impede any economic development.
5/7	Environment Canterbury	Objective 6	Support	Support the need to revisit allocation of water resources in order to address over-allocation and readjust allocation based on priorities. Further guidance in the NPS is required.
7/3	Manukau City Council	Objective 2	Support	Agree that the statutory responsibilities in the RMA between regional and territorial authorities need to be more clearly defined.
10/6	Environment Bay of Plenty	Whole Document	Support In Part	In some instances, wetlands may require a different management approach. This should be recognised in the NPS. For example, there is an urban wetland in Auckland which is used for stormwater treatment. Management of this type of wetland would be different than for a natural wetland in a rural environment.
10/25	Environment Bay of Plenty	Policy 2	Support	Agree that the requirement under Policy 2(c)(iii)(A) for the "protection against degradation" is more rigorous than what is required under the RMA.
11/15	Local Government New Zealand	Whole Document	Support	The NPS should provide more guidance on the management of 'at risk' catchments.
11/21	Local Government New Zealand	Whole Document	Support	Agree that the NPS does not address freshwater resources other than 'outstanding' or 'degraded'. NPS should set out a management approach for all freshwater resources, as it is just as important to require those that are not yet degraded to be maintained so that they do not become degraded.
14/8	New Zealand Historic Places Trust Pouhere Taonga	Whole Document	Oppose	Artificial watercourses should not be included in the definition, especially those that are established for stormwater conveyance.
17/2	East Coast Hawke's Bay Conservation Board	Objective 3	Oppose	It is not realistic to expect that all waterbodies, particularly in urban environments, can meet a 'swimmable' standard much less one that requires it to 'be safe for food gathering'. This objective may be desired for some waterbodies; however, this expectation should not be created for all waterbodies, even with the qualifying word "appropriate" Freshwater Resources.
18/8	Ngati Awa & Mataatua Assembly	Objective 7	Oppose	Oppose the deletion of the word 'excessive' (or equivalent qualifier), which would change 'avoiding excessive contamination' to 'avoiding contamination'. While all practicable measures should be taken to avoid contamination, it is unrealistic in an urban setting to avoid contamination entirely.

18/12	Ngati Awa & Mataatua Assembly	Policy 1	Oppose	The practical intent of this submission is unclear, and could potentially impose an additional requirement on the development of essential infrastructure. Other methods could be used to ensure that tangata whenua are considered in the development of new infrastructure.
28/1	Beacon Pathway Ltd	Whole Document	Oppose in part	Care must be taken in adopting standards from other jurisdictions. Additionally, the use of discharge standards set at a national level is unlikely to reflect community values.
33/4	Guardians of Lake Wanaka		Oppose	Agree with statement that the devolution of responsibility to each regional authority to establish their own standards will lead to uneven standards across the country. However, we do not agree with setting national discharge standards, but rather suggest the development of a national framework for standard setting that allows regional councils to set the specific standards within the context of the national framework.
42/9	New Zealand Conservation Authority		Oppose	The desired water quality outcome should be established for each waterbody based on its Values and identified existing or future uses and the standards set accordingly. It is not realistic or desired to set an expectation that all freshwater will be safe for food - gathering. In particular, this is not achievable in an urban environment.
42/12	New Zealand Conservation Authority	Objective 3	Oppose	As above
50/3	Watercare Services Ltd	Objective 3	Support	Agree that it may not be realistic to restore many urban streams and catchments to a swimmable state. The values and uses for each freshwater resource must be identified and a management strategy (which may or may not include standards) should be developed appropriate to those values and uses.
50/10	Watercare Services Ltd	Policy 1	Support	Agree with the approach that a national framework (or guidelines) for standard setting is established at the national level with the responsibility for standard setting at the regional level.
50/11	Watercare Services Ltd	Policy 1	Support	Agree that domestic and municipal water supply should be included as a value.
50/20	Watercare Services Ltd	Policy 3	Support	Agree that it is not practicable to 'protect' all Freshwater Resources against degradation, especially those in highly built up urban environments.
50/25	Watercare Services Ltd	Whole Document	Support	Agree that remedying the state of all streams so that they are swimmable is an unrealistic goal, especially in urban environment. Also support the role of the community in establishing the desired values and uses of waterbodies.
52/2	Regional Public Health	Objective 3	Oppose	It is not realistic to expect that all waterbodies, particularly in urban environments, can meet a 'swimmable' standard much less one that requires it to 'be safe for food gathering'. This objective may be desired for some waterbodies, and that should be clearly set out in a specific management strategy for those waterbodies. However, this expectation should not be created for all waterbodies, even with the qualifying word "appropriate" Freshwater Resources.
61/7	Lakes Water Quality Society	Objective 2	Oppose	It is not realistic to expect that all waterbodies, particularly in urban environments, can meet a 'swimmable' standard or one that provides for the protection, propagation and safe harvesting of fish, shellfish, wildlife and mahinga kai. The specific water quality outcomes desired should be established for all waterbodies based on their identified values and current or future uses.
82/7	Auckland City Council	Policy 1	Support	Agree that standards for freshwater quality and environmental flows should not be set for urban streams, and agree that in some cases the Best Practicable Option is preferred.
86	Friends of Oakley Creek & STEPS	Objective 4	Oppose	It is not practicable to avoid all discharges into urban waterways. Wastewater is not intentionally discharged to urban streams; however, to function effectively wastewater systems are designed with controlled overflow points as a way to manage any discharges caused by blockages. Urban streams are typically used for stormwater conveyance. It is not practicable to require the treatment of stormwater run-off from non-point sources.

87/3	North Shore City Council	Whole Document	Support	Agree that the roles and responsibilities for urban stormwater need to be clarified.
92/1	Water Rights Trust Group	Whole Document	Oppose	Oppose the requirement that standards be set for all waterbodies. If standards are adopted, national guidance on standard setting should be provided, and standards set based on the values and uses for each waterbody.
100/8	Te Runanga o Ngati Hine	Objective 3	Oppose	It is unrealistic to expect all freshwater bodies, particularly those in urban areas, to meet drinking water standards.
101/8	NIWA	Objective 1	Oppose in part	Agree that it is important to clarify how the NPS (and the NZ Coastal Policy Statement) relate to estuaries, but further work is required to determine if the objectives and policies of this NPS are appropriate for estuaries. Would support, however, that the relationship of the NPS to estuaries to be clarified.
113/28	Fonterra Cooperative Group Limited	Whole Document	Support	Agree that it is not "land use development" itself that should be controlled or managed, but rather any adverse effects of land use activities that occur.
118/31	Horticulture New Zealand	Whole Document	Oppose	It is not appropriate to include a specific figure for a reasonable take in a NPS.
123/8	Whanganui River Maori Trust Board	Objective 3	Oppose	It is unrealistic to expect all freshwater bodies, particularly those in urban areas, to meet drinking water standards.
127/5	Te Runanga o Ngai Tahu	Objective 3	Oppose	It is unrealistic to expect all freshwater bodies, particularly those in urban areas, to meet swimming standards.
127/21	Te Runanga o Ngai Tahu		Oppose	Achieving a swimmable standard may not be appropriate for all waterbodies. If adopted, standards should be applied based on the specific values and existing and future uses of a waterbody.
139/3	Community & Public Health; Canterbury District Board	Objective 3	Oppose	It is unrealistic to expect all freshwater bodies, particularly those in urban areas, to meet drinking water standards much less for food gathering.
148/4	Carter Holt Harvey Limited	Whole Document	Support	Agree that the NPS takes a fundamentally different approach to land use that the RMA. The NPS should be consistent with the philosophy of the RMA.