

16 April 2009

The Chairperson
Board of Inquiry – Water
Freepost Board of Inquiry – Water
c/o PO Box 10362
WELLINGTON 6143

RE: Further submission on the publicly notified Proposed National Policy Statement on Freshwater Management

This is Christchurch City Council's further submission, in opposition and support to other submissions on the Proposed National Policy Statement for Freshwater Management (the NPS). Please note that the views expressed in this further submission are those of Christchurch City Council staff, and should not be interpreted as representing the views of Christchurch City Council Councillors.

1. Submissions that seek the withdrawal of the NPS

- 1.1 Christchurch City Council (the Council) opposes in part the submissions of:
- Meridian Energy Limited (submission number 153)
 - Oil Industry Environment Working Group (submission number 108)
 - Wairakei Pastoral Limited (submission number 128)
 - New Zealand Institute of Forestry (submission number 142)
 - Carter Holt Harvey Limited (submission number 149)
- 1.2 These submissions all seek the withdrawal of the NPS. Their reasoning varies from the lack of clarity the current draft provides and the failure to provide guidance on allocation of water, to its 'inappropriateness'.
- 1.3 The Council agrees that the objectives of the NPS as written are unclear, and that the proposed Policies will not address some of the significant issues facing freshwater management (as stated in our original submission). However, the NPS has the potential to provide a much-needed national framework for decision-making. It is clear from the issues identified in the Section 32 Evaluation that the current approach to freshwater management is not leading to good environmental, social, cultural, and economic outcomes. National policy in the form of an NPS can guide and direct local authorities and the Environment Court, improving decision-making, and ensuring this important resource is efficiently and effectively managed for current and future generations.
- 1.4 The Council seeks that the NPS process continue.

2. Submissions that question the focus on Land-use Development

2.1 The Council supports in part the submissions of:

- Hancock Forest Management (submission number 10)
- IPENZ Engineers New Zealand (submission number 29)
- New Zealand Freshwater Sciences Society (submission number 56)
- University of Canterbury (submission number 62)
- New Zealand Conservation Authority (submission number 65)
- Federated Farmers of New Zealand (submission number 88)
- Fonterra Cooperative Group Limited (submission number 101)
- Wenita Forest Products Limited (submission number 111)
- Regional Public Health (submission number 112)
- Meat and Wool New Zealand (submission number 115)
- Dugald MacTavish (submission number 139)
- New Zealand Institute of Forestry (submission number 142)

2.2 These submissions all seek amendments that change the current focus of the NPS on 'Land-use Development'. The amendments sought generally request that the NPS focuses on current land-use as well as development, and on the effects of land-use activities rather than land-use itself.

2.3 Existing land-uses and practices are major contributors to the degradation of freshwater resources. The Council therefore agrees with the submitters above that the significant issues facing freshwater management in New Zealand will not be addressed by focussing solely on 'Land-use Development' – intensification, change and subdivision.

2.4 The Council seeks that Objective 4, Objective 5, Policy 1, Policy 2, Policy 3, Policy 4, Policy 5 and Policy 6, are amended to refer to 'Land-use **and** Development'.

3. Submissions that request the NPS includes public health

3.1 The Council supports in part the submissions of:

- Southland District Council (submission number 40)
- Simon Berry Environment Law (submission number 48)
- Regional Public Health (submission number 112)
- Canterbury District Health Board (submission number 127)
- Watercare Services Limited (submission number 140)

3.2 These submissions seek a greater emphasis on the importance of freshwater to public health.

3.3 The Council agrees with the submitters above that the quantity and quality of freshwater resources are critical to public health. Improving public health should be a key driver for the NPS, which has the potential to have a positive impact on public health across New Zealand.

3.4 The Council seeks that the Preamble be amended to refer to the importance of freshwater management to public health, and that the definition of 'Notable Values' be amended to include the value of freshwater for public health.

4. Submissions that request more guidance on dealing with cumulative effects

4.1 The Council supports in part the submissions of:

- Greater Wellington Regional Council (submission number 7)
- Environment Canterbury (submission number 9)
- NIWA (submission number 11)
- New Zealand Fish and Game (submission number 12)
- Manakau City Council (submission number 17)
- Mackenzie District Council (submission number 19)
- Northland Regional Council (submission number 27)
- Local Government New Zealand (submission number 30)
- Environment Waikato (submission number 32)
- Auckland Regional Council (submission number 37)
- Ngati Kahungunu Iwi Incorporated (submission number 39)
- South Waikato District Council (submission number 45)
- Canterbury Aoraki Conservation Board (submission number 47)
- Simon Berry Environmental Law (submission number 48)
- New Zealand Freshwater Sciences Society (submission number 56)
- New Zealand Conservation Authority (submission number 65)
- Te Runanga o Ngai Tahu (submission number 66)
- Auckland City Council (submission number 76)
- Taranaki Regional Council (submission number 77)
- Ruapehu District Council (submission number 98)
- Hawkes Bay Regional Council (submission number 129)

4.2 These submissions identify that the NPS does not address the cumulative effects of land-use activities.

4.3 The potential for individual land-use activities to have a cumulative effect on water quantity and quality is a key issue identified in the Section 32 Evaluation. Although the NPS requires the setting of water quality and flow standards, which will assist in establishing environmental limits, the NPS does not provide a clear direction to local authorities or the Environment Court to avoid the impact of cumulative effects on water quality and quantity when making decisions on individual resource consents, subdivision consents, plan changes or variations. Including an unambiguous direction on cumulative effects in the NPS would support and reinforce local authority's efforts in this area.

4.4 The Council seeks that the NPS contains an objective which states that cumulative effects of land-use activities must be managed, and amendments to Policy 4 and Policy 5 to ensure that the cumulative effects of activities on freshwater resources are no more than minor.

Thank you for the opportunity to make a further submission. CCC wishes to be heard in support of this further submission. If you require clarification or additional information, please contact Lizzy Pearson, Senior Policy Analyst on (03) 9418396 or Elizabeth.pearson@ccc.govt.nz.

Yours sincerely

A handwritten signature in black ink that reads "Tony Marryatt". The signature is written in a cursive style with a long horizontal stroke at the end of the name.

Tony Marryatt
CHIEF EXECUTIVE
CHRISTCHURCH CITY COUNCIL