

23 January 2009



Board of Inquiry – Water
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Dear Sir or Madam

SUBMISSION TO PROPOSED NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

Thank you for the opportunity to consider and make a submission to the Proposed National Policy Statement for Freshwater Management.

Please find Horizons Regional Council's submission attached. This is a hard copy of Horizons submission sent by email on Friday 23 January 2009.

Horizons wishes to be heard, but if others make a similar submission, Horizons will consider presenting a joint case with them at a hearing.

If you wish to follow up any of the matters presented in the submission, please contact Barry Gilliland on freephone 0508 800 800.

Yours sincerely

A handwritten signature in black ink, appearing to read "Garrick Murfitt", written over a faint, larger version of the same signature.

Garrick Murfitt
CHAIRMAN

Encls Horizons Regional Council Submission on the Proposed National Policy Statement for Freshwater Management

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

Horizons Regional Council

Submission on the Proposed National Policy Statement for Freshwater Management

Introduction

1. The following submission outlines Horizons Regional Council's view of the Proposed National Policy Statement for Freshwater Management (proposed NPS). It is significantly influenced by Horizons' freshwater management policy development for the Manawatu-Wanganui Region contained in the Proposed One Plan¹.

Freshwater Management in Manawatu-Wanganui Region

2. Horizons is reviewing its operative Regional Policy Statement and all its regional plans. The review document is known as the Proposed One Plan and it is currently in the Hearing Process prescribed by the Resource Management Act 1991 (RMA). This review is a major project for Horizons demanding a significant level of staff and financial resources during its development and journey through the RMA planning process.
3. Horizons' approach in the proposed plan is to focus its resources on making significant progress on the four biggest environmental issues identified for the Region: surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened native biodiversity. These issues were identified during public consultation and confirmed by the results of Horizons' science research.
4. The Proposed One Plan contains an integrated approach to freshwater management. It recognises that the four issues have significant interconnection and that work on one issue will also benefit progress on one or more of the other issues.
5. Horizons' broad approach to water quality and water quantity management in the Region is to:
 - Divide the rivers and lakes of the region into 119 catchment-based water management sub-zones;
 - Identify water management values for each water management sub-zone, eg. ecosystem, recreational, cultural, water use and social/economic;
 - Assign water quality standards to water management sub-zones according to their values;
 - Manage water quality and water quantity to meet water management sub-zone standards
6. Chapter 6 of the Proposed One Plan contains policies that:
 - Set up the water management frame work (Policies 6-1 & 6-2);

¹ Horizons Regional Council: Proposed One Plan – The Consolidated Resource Policy Statement, Regional Plan and Regional Coastal Plan for the Manawatu-Wanganui Region, May 2007.

- Seek ongoing compliance with water quality standards where these are currently met (Policy 6-3);
- Seek to enhance water quality where water quality standards are not currently met (Policy 6-4);
- Control discharges onto land and into water;
- Control land-use activities in water management zones where they are the predominant cause of surface water quality degradation (Policy 6-7);
- Seek to maintain groundwater quality (Policy 6-7);
- Set minimum flows and allocation limits for all surface waters in the Region (Policies 6-15, 6-16 & 6-17);
- Set allocation limits for all groundwater resources in the Region (Policy 6-23);
- Set standards for takes from and/or changes to water levels in the Region's wetlands and lakes (Policies 6-20 & 6-25); and
- Seek efficient, reasonable and justifiable use of water (Policies 6-12 & 6-13).

7. A significant number submissions relate to these water management policies and they may be subject to change during the Proposed One Plan hearing process.

Proposed NPS

8. Horizons supports the general intent of the proposed NPS. It considers guidance on nationally significant values and outcomes for freshwater will assist local government decision-makers address the wide range of freshwater management issues they are challenged with.
9. This will be especially helpful for Horizons where a final NPS supports or adds weight to current freshwater management policy developed for the Manawatu-Wanganui Region in the Proposed One Plan. The ideal outcome for Horizons would be the final NPS and the freshwater management provisions of the Proposed One Plan to be so compatible that variations or changes to the One Plan are not required to give effect to the NPS.

Local Government New Zealand Submission

10. Horizons was party to the development of the submission made by Local Government New Zealand². This submission can be accepted as having Horizons support and it is considered that the "Alternative NPS" outlined in Part 3 of that submission is a much more helpful and workable approach for Horizons than the proposed NPS as currently drafted.

Horizons Submission Points

11. In the context of current development of freshwater management policy in the Proposed One Plan, Horizons has two significant concerns about the impact of the proposed NPS on its current policy development:

² Local Government New Zealand "Submission to the Board of Inquiry on the Proposed National Policy Statement for Freshwater Management, 6 January 2009."

- a. A major issue for Horizons is the potential for the proposed NPS to require an untimely review of freshwater management policy in the (by then) operative One Plan. This concern arises because of the high level of process focus and the prescriptive timeframes contained in the proposed NPS. Horizons is concerned that the investment in current freshwater management policy development in the Proposed One Plan will be, at least in part, wasted if the final NPS requires a review shortly after it becomes operative. It is also likely to draw staff and financial resources from implementation of the One Plan. A review so soon after the current review process would be untenable for Horizons and a significant, unnecessary burden on the region's ratepayers.
 - b. The approach taken in the proposed NPS seems prescriptive and process heavy. This appears to be the consequence of an incorrect assumption that freshwater management is only just beginning in New Zealand. This is certainly not the case in the Manawatu-Wanganui Region where a significant investment has been made to develop freshwater management policy tailored to the needs of the region. Horizons is concerned that this level of prescription will lack flexibility and may require changes to what we believe to be innovative solutions to the Region's water management issues provided for in the Proposed One Plan.
12. The proposed NPS is also uncharacteristically difficult to read and understand compared to previous proposed NPS and NES documents produced by the Ministry for the Environment. Horizons is concerned that this lack of clarity will result in implementation of the NPS being fraught with interpretive debate.

Relief sought

13. Horizons Regional Council requests the Board of Inquiry accept the submission made by Local Government New Zealand and adopt the relief sought by that submission, specifically that the proposed NPS be redrafted in way that is consistent with the "Alternative NPS" presented in Part 3 of that submission.
14. Horizons Regional Council wishes to be heard on this submission. Please contact Barry Gilliland on freephone 0508 800 800 or email barry.gilliland@horizons.govt.nz for further information.

Garrick Murfitt
CHAIRMAN