



File Ref: PP-15-08.v01

16 January 2009



Freepost Board of Inquiry - Water
c/o Minister for the Environment
PO Box 10362
WELLINGTON 6143

Dear Sir/Madam

**SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR
FRESHWATER MANAGEMENT**

Introduction

1. This is a submission on the Proposed National Policy Statement for Freshwater Management.
2. The New Plymouth District Council (the council) thanks the Board of Inquiry for the opportunity to make a submission on the Proposed National Policy Statement for Freshwater Management.
3. This submission currently represents council officers' views. Therefore, the council officers' submission will be reported to the council Policy Committee for recommendation to the Full Council for confirmation (including any additional changes/comments from council) and will be subsequently confirmed to the Board of Inquiry.

The Submission

4. The council's submission relates to the Proposed National Policy Statement for Freshwater Management in its entirety.
5. The council supports in principle the development of national policy statements where they are able to provide clear, meaningful, useful and constructive guidance to local authorities on matters of national significance. The preparation of a national policy statement to recognise the importance of freshwater management is generally supported.
6. The council submission is in support of the contents of the submission from Local Government New Zealand (LGNZ).
7. The council submits that it has concerns regarding the timeframes for, and process costs associated with, implementing the Proposed National Policy Statement for Freshwater Management. This aspect of the council submission is considered to be

consistent with sections 2.2(d), 2.23, 2.24, 3.11, 3.12, 3.13, 3.22(b), and 15 of the LGNZ submission. Further, notwithstanding the fact that 40 working days is completely unrealistic with respect to preparing and notifying a proposed plan change, it is considered that Policy Four of the Proposed National Policy Statement for Freshwater Management essentially represents duplication of the regional council function. It is therefore considered questionable as to whether the bureaucratic cost of giving effect to the policy can be justified in relation to the expected benefits.

8. The council submits that the different roles of regional councils and territorial authorities are not clear and that further clarification/guidance is required. This aspect of the council submission is considered to be consistent with sections 2.2(e), 3.14, 3.15, and 3.16 of the LGNZ submission. It is also considered that Policy Five of the Proposed National Policy Statement Freshwater Management essentially represents duplication of the regional council function. Again, it is therefore questionable to whether the bureaucratic cost of giving effect to the policy can be justified in relation to the expected benefits
9. The council submits that domestic and municipal supply should have priority over other water users. This aspect of the council submission is considered to be consistent with sections 2.11, 2.12, 7, and 8 of the LGNZ submission.
10. The council submits that it is inappropriate to require district councils to monitor and report on freshwater management issues and that that obligation is more appropriately ascribed to regional councils. This aspect of the council submission is considered to be consistent with sections 2.21, and 14 of the LGNZ submission.
11. In summary council therefore supports the notion of a National Policy Statement for Freshwater Management but strongly considers that there is a clear requirement to ensure that there is no duplication of function between regional and district councils, and that the statutory roles are clearly defined within the Proposed National Policy Statement for Freshwater Management, as per the existing statutory function requirements of sections 30 and 31 of the Act.
12. The council again thanks the Board of Inquiry for the opportunity to make a submission on the Proposed National Policy Statement for Freshwater Management.
13. The council does wish to be heard in support of its submission.

Yours faithfully



Frank Versteeg
General Manager Strategy and Policy