



53

**FORM 3:**

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

Section 49 of the Resource Management Act 1991.

To: the Chairperson  
Board of Inquiry

This is a submission on the following proposed national policy statement (the proposal):

Proposed national policy statement for freshwater management.

The specific provisions of the proposal that my submission relates to are:

**Parts of objectives 1, 2, 3, and 4, and Objective 9**

**Parts of Policy 1 (a) to (h), and Policy 3**

The Hutt City Council submission is:

**OBJECTIVES**

The Hutt City Council (HCC) generally supports Objectives 1 and 2 but seeks amendments and clarifications.

HCC generally supports Objective 3 but with closer definition of some of the terms.

HCC generally supports Objective 4 but requires better definition of some of the terms as they relate to the stipulated activities

HCC would support Objective 9 but only if there is a requirement to provide leadership and guidelines around monitoring nationally.

**POLICIES**

HCC would support Policy 1 (a) to (g) if the provisions reflected the purposes for which water bodies are intended to be managed.

HCC supports Policy (h), and suggests that examples be recognised such as low impact designs.

HCC does not support the timetable in Policy 3 in its present form.

Hutt City Council seeks the following changes to the proposal:

#### **OBJECTIVES 1 and 2**

While these are generally supported Objective 2 is incredibly difficult to read and is grammatically clumsy, which effectively obscures its meaning.

It is noted that some of the submissions that the Council has seen, advocate the inclusion of policies that recognise the interconnected nature of catchment issues in the maintenance of freshwater values. It is the view of this Council however that while this is extremely important these are matters better left to the mechanisms and provisions in district and regional plans, where they can more accurately reflect particular local circumstances, rather than be controlled by National Policy Statement provisions.

#### **OBJECTIVE 3**

A much better definition of "appropriate" is required and also clarification of "reach or exceed a swimmable standard". There are significant bush and forest areas within Hutt City where natural and animal discharges will prevent that (or a similar) standard being reached either periodically or continuously.

#### **OBJECTIVE 4**

It is not clear what life supporting means in the context of the qualifying activities (a), (b), and (c). In addition the terms "ecological values" and "inappropriate with reference to those values are not clear and could be subject to a wide range of interpretations.

#### **OBJECTIVE 9**

While monitoring is undertaken as part of the effective management of district plans, there will be a requirement to provide leadership and guidelines around freshwater monitoring nationally.

#### **POLICY 1 (a) to (g)**

The use of the terms "notable", "outstanding", and "degraded" do not represent any accepted or nationally recognised resource management terms relating to agreed standards. This could cause uneven application of the terms to various water bodies depending on local interpretation. A solution for this would be for the policy to reflect the purposes for which water bodies are intended to be managed.

#### **POLICY 1 (h)**

Include a reference by way of example to low impact design solutions.

**POLICY 3**

**This is of serious concern to Hutt City Council. The whole question of a timetable for, and the sequencing of, district plan changes consequent on regional plan changes and/or national and regional policy statements (or changes) needs to be completely thought through. District plan changes cannot simply be ordered within an arbitrarily established time span, especially with matters that will vary across a region and may require specialist or consultant input from a variety of specialists.**

The Hutt City Council wishes to be heard in support of this submission and if others make a similar submission, will consider presenting a joint case with them at a hearing.

.....  
Signature of submitter  
(or signature of person authorised to sign)

.....  
Date 22 January 2009  
(A signature is not required if you make your submission by electronic means.)  
Address for service of submitter;  
Stuart Duncan  
Hutt City Council  
Private Bag 31 912  
LOWER HUTT  
Telephone: (04) 570 6792  
Fax/email: (04) 570 6868  
Contact person: *[name and designation, if applicable]*  
Stuart Duncan  
General Manager Projects  
Email: [stuart.duncan@huttcity.govt.nz](mailto:stuart.duncan@huttcity.govt.nz)

