1. Introduction

1.1. This is a submission on the discussion document “Action for healthy waterways – A discussion document on national direction for our essential freshwater”, Publication Number ME 1427 (Discussion Document).

1.2. Dennis Scott is a practicing Landscape Architect with 50 years practical research, application and implementation experience in an Integrated Catchment Management design approach to all project work (See: https://link.springer.com/article/10.1007/s42532-019-00034-2)

1.3 The state of freshwater in New Zealand, which forms the background need for the proposed reforms have been well outlined in recent authoritative publications including assessments by the Ministry for the Environment (MFE) and Statistics New Zealand:

The findings in this report, Environment Aotearoa 2019, paint an alarming picture:

i. In areas of pastoral farming the median concentrations of nutrients, pathogens and sediment is between 2 and 15 times higher than natural conditions.

ii. Some 71% of river lengths in pastoral farming areas have levels of nitrogen that may cause some growth effect on aquatic species and 82% have pathogen levels that would pose risks to human health from swimming.

iii. Whilst many argue that there needs to be equitable treatment between urban and rural, the reality is that the majority of the improvements to freshwater use will need to occur in rural New Zealand.

2. Overall Brief Submission
2.1. The political discourse that argues that the current proposals represent an entirely new direction for freshwater management is not supported by the evidence.

2.3. Indeed, it is the opinion of this submission that irrespective of the current round of NZPS policy formulation, the entire process is mis-timed and out of sync with overall RMLA reform and fundamental societal structural change to meet rapidly changing international and local predicaments and realities.

2.4 In this context, what is now proposed is not only incremental change, it is the submitters view that any change will remain captured in both a fragmented and siloed decision-making paralysis.

2.5. Additional existing or proposed national instruments ALL impinge to on freshwater management (These are described in Chapter 11 of the Discussion Document). These include:
   i. National Policy Statement for Urban Development (NPS-UD)
   ii. Proposed National Policy Statement for Highly Productive Land (NPS-HPL)
   iii. Proposed National Policy Statement for Indigenous Biodiversity (NPS-IB)
   iv. National Environmental Standard for Plantation Forestry (NES-PF)
   v. New Zealand Coastal Policy Statement (NZCPS)

And to some extent the:
   i. National Policy Statement for Renewable Electricity Generation (NPS-REG)

2.6 All of the above remain fragmented policy statements.

1.7 Until some specific and integrated political alignment of spatial planning for all environmental, social, economic and cultural interactions are developed, there can be no practical implementable pathway to sustainable land-use outcomes in NZ/Aotearoa.

2.7 The Catchment Management approach is the only tested and known framework available to envision and indeed achieve the critically important policy outcomes.