

## PROPOSED AMENDMENTS TO THE NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT 2011

Submission from:

Linda Conning

[withheld]

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I am a resource management planner and a graduate member of NZPI. I have been involved in freshwater planning issues in the upper North Island over the past 15-20 years. I live close to the Rangitaiki River in the Whakatane District.

I generally support the proposed amendments and the introduction of the National Objectives Framework with compulsory national environmental “bottom lines” and the freshwater accounting requirements. There is overwhelming evidence that the state of fresh waterways is continuing to decline in lowland catchments and regulatory action is necessary. Stakeholders from all interest groups have been spending considerable time and financial resources in disputes of water provisions in planning documents and resource consents. The National Objectives Framework should over time reduce these demands.

Specific Comments

Objective A1 (b)

The restriction to “secondary contact” undermines the effect of the bottom lines. To be able to safely swim in the local river is a fundamental aspect of the kiwi culture, and is an aspiration I have for my local river and for my grandchildren.

Decision requested

Amend Objective A1 (b) to replace “secondary contact” with “contact recreation”.

Objective A1 (c)

I support a provision to provide for the mauri of the water, as determined by tangata whenua.

Decision requested

Retain Objective A1 (c) in a form acceptable to tangata whenua.

Objective A2

I am disappointed that the government has retained the word “overall” in this provision. Officials at the roadshow stated that this was to allow tradeoffs and the Opuha dam was given as an example. Without making any judgement on that particular example, my view is that such a qualification is not necessary given that the wording of s 104 means that an NPS is not mandatory, subject to Part II, which provides that sustainable management is to be promoted. Inclusion of the word overall significantly weakens the NPS.

Decision requested

Remove the word “overall” from Objective A2.

Policy CA2 Exceptions

This aspect is problematical. It is reasonable to provide exceptions where water quality is reduced for natural causes e.g. geothermal. However (b) (i) is open to abuse and removes the incentive to find solutions. This seems to be designed to provide for the Kawerau pulp mill discharges to the Tarawera River, a consent which includes targets for improvement.

It should not be decided regionally, as such cases should be truly exceptional. In any case, it would most likely only apply to significant existing infrastructure which is to be included in Appendix 3.

#### Decision sought

Exceptions should only be provided for truly exceptional situations, and decided nationally. Whilst it is accepted that existing significant infrastructure could be dealt with through an Appendix, this should not apply to new infrastructure, which should be designed and developed in a sustainable manner. Infrastructure should not get a “free pass” just because there is *some* economic benefit. The benefit should be substantial, and not available from alternative sites or methods, and should be the most sustainable solution.

#### Monitoring Plans

Whilst I appreciate that the appropriate spatial scale can only be determined on a case by case basis, I am concerned that this may result in inadequate monitoring, when considering Policy CB 1 Monitoring Plans where a council is only required to identify a site for each unit. If the units are very large, this could result in ineffective monitoring.

#### Decision requested

Amend Policy CB 1(b) to read:

“Identifies representative sites commensurate with the extent of the freshwater management unit, at which monitoring will be undertaken”

#### Appendix 2 Attribute tables

Whilst it is appreciated that it may not be possible to immediately place numerical values on some attributes, where that is not possible, narrative statements should be included to give guidance on the outcomes to be achieved.

Some of the levels seem unduly high e.g. nitrate toxicity impacting on 20% of sensitive species. It would seem that sensitive species require a greater degree of protection.

#### Decision requested

Review the Attribute tables to include narrative standards where numerical ones are not available.

Review the nitrate standard.