



RUAPEHU DISTRICT COUNCIL

[withheld]

Website www.ruapehudc.govt.nz

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To: Freshwater Reform
Ministry for the Environment
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Subject: Freshwater Reform

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1 General Comments

- Ruapehu District Council would like to thank the Ministry for the Environment for the opportunity to make a submission on the proposed amendments to the National Policy Statement for Freshwater Management 2011 (NPSFM) and wishes to speak in support of its submission.
- Ruapehu District Council supports Local Government New Zealand's submission on the proposed amendments to the National Policy Statement for Freshwater Management 2011 (NPSFM) but, wish to highlight the following points:

1.1 National Objectives Framework

- This is a fundamental step that will form the foundations of moving towards 100% pure New Zealand that is defining levels for water quantity and quality across New Zealand.
- Imposing additional values of tangata whenua, compulsory values and national bottom lines may be a step too far at this stage while this framework is being developed. Imposing monitoring objectives against all values may result in duplication and significant additional costs to territorial authorities as well as, New Zealand as a whole, without achieving the objectives of the Freshwater Reform. Therefore, it would be more appropriate to take the current monitoring data held in the national database as a means of validating the assumptions.



- Potentially, the science used to generate the National Freshwater Reform may have developed this cohort but, the science has not been provided to Councils to evaluate the delivery of this cohort.

1.2 Stormwater infrastructure

- Much of the stormwater contamination is generated by State Highways so, there needs to be a mechanism to engage and understand the projections of road users, in order to understand the costs from this area. The actual contaminate type has different treatment options and must be clearly identified as a problem, before any infrastructure is built.
- There are a significant number of discharge points across the catchments which need to be prioritised and subsequently treated. Treatment of each small site without appropriate consideration is simply unsustainable or affordable.

1.3 Unique Streams in Freshwater Management Unit

- There are some unique streams with water characteristics that do not appear to have been considered by this system. Because of their natural formation, they are unlikely to comply with the general tenure of the Freshwater Management Unit and need to be considered for their own unique quality. The Freshwater Management Unit is unlikely to be derived at levels that account for these small unique streams or swamps.
- In the Ruapehu District, there are the following areas that contain streams and swamps with these unique water characteristics:
 - National Park has at least two high altitude swamps which intimately release into a relatively pristine stream. They are natural features but, they do affect water quality for a period, e.g. slime growths for a period of time.
 - The Taringamotu Stream originates from hot springs with associated high salt levels.

1.4 Monitoring

- A natural monitoring database should have clearly set out protocols on the testing method, sampling method and storage method so that information can usefully be assessed across the country.
- Residual flows and flushing flows and their loss from cross catchment transfers for hydro-electric power generation are not well documented as effects.

1.5 Funding Mechanisms

- Ruapehu District Council sees significant financial implications in the delivery of these objectives, goals and values. The mechanisms imposed by government is to require the population within regions or districts to be rated for its environmental delivery. However, the actual use of the environment is by a greater population including New Zealand resident and international visitors. For example, for the one million people using the Dual World Heritage Tongariro National Park. The current mechanism used to provide supporting infrastructure is rated from resident populations only. But, peak demand is often generated from day visitors using Crown land which falls outside Ruapehu District Council's ability to rate. In addition, past actions have seen water volumes removed from Ruapehu District Council's area to allow the country to generate hydro-electric power. This severely impacts on the compulsory and national bottom lines and tangata whenua values.
- With declining residential populations, it may be fairer to impose a goods and services tax (GST) across New Zealand in order to achieve New Zealand's

environmental objectives, goals and values at a national rather than a regional or district level.

1.6 Conclusion

- Ruapehu District Council agrees in principle with the National Objectives Framework that imposes compulsory values and national bottom lines which will enable territorial and local authorities to work alongside their communities to protect and improve the level of its freshwater management within New Zealand. However, in doing so it is imperative that these mechanisms do not constrain Council's ability to achieve these outcomes given that the regions and districts within New Zealand have differing effects and impacts in terms of its freshwater characteristics. These constraints also need to consider the current funding mechanisms that control rates within each area with no ability to increase this level of funding to account for the overflow of visitors that utilise the region or district outside of the resident population.