



National Policy Statement for Freshwater Management Implementation Review

Auckland – Tāmaki Makaurau

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Regional overview

Our most populated region, Auckland, sits between the Kaipara Harbour and Waiwera in the north, the Hauraki Gulf along much of the eastern shore and the Bombay Hills and Āwhitu Peninsula to the south and also includes the several Hauraki Gulf islands. Although Auckland is most known for its urban centre, this only represents about 11 per cent of the region's land area.¹ Nearly half of the region is farmland, and the rich soils around Pukekohe and Franklin are among the nation's most productive for agriculture. Another quarter of Auckland is covered by native vegetation with the remainder being exotic forests and other uses.

Because of its location on a narrow isthmus bounded by large harbours, no mainland part of the region is more than 20 kilometres from the coast (figure 1). Catchments are generally small with short first or second order rivers and intermittent streams. Fewer than 10 per cent of these drain urban areas. Most come from rural farmland, native bush or exotic forests.

Despite covering less than 2 per cent of New Zealand's total land area, Auckland contains over a third of the population and faces a very high growth rate. The resulting increase in housing and infrastructure development, vehicles and wastewater places severe pressures on freshwater quality, particularly with regard to sediment, metals and other contaminants associated with urban areas.

More than half of the streams monitored for ecological health are considered poor or degraded, especially in urban areas where levels of metals, sediment and other contaminants are high.² Many urban streams have been piped or constrained in concrete channels, eliminating habitat. Turbidity and sediment are major issues with significant impacts on estuaries and harbours. *Escherichia coli* levels do not meet guidelines for swimming or other primary contact recreation in many Auckland rivers, often creating health risks at popular beaches. In urban areas, this is typically the result of wastewater overflows and contaminated stormwater during rainstorms. Rural streams generally have better water quality although also face problems with elevated levels of nutrients, sediment and *E. coli* in some areas of more intensive agriculture and towns with aging or improperly maintained septic systems. Groundwater quality varies considerably according to land use, age and degree of confinement. Some aquifers, particularly in the central and southern volcanic zones, have levels of nitrate, *E. coli*, metals or other contaminants above guideline standards for drinking water.

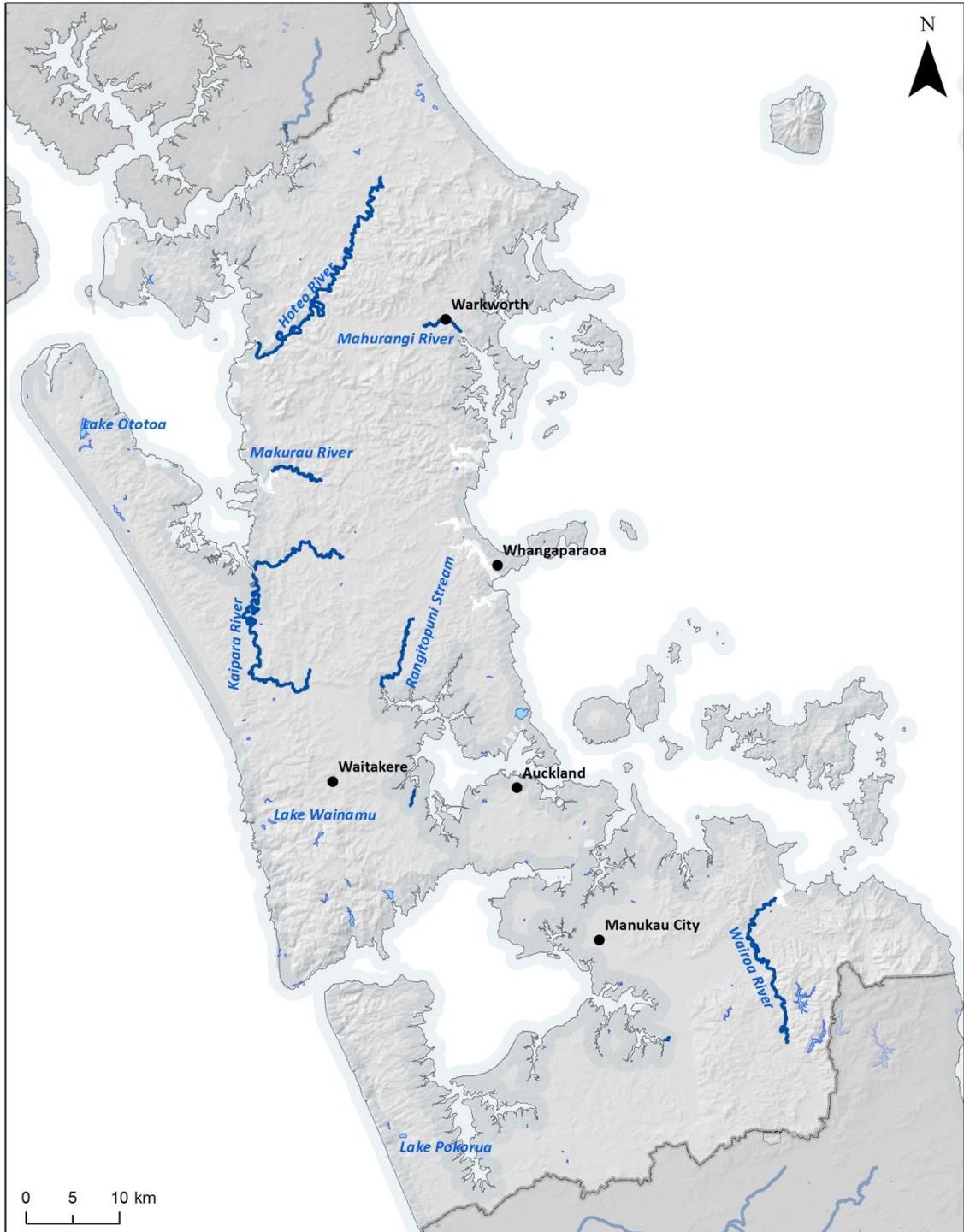
Water quantity is highly allocated in many parts of the region, particularly in the northern areas. More than half of this allocation is for residential supply (figure 2).³ In addition to this, Auckland increasingly depends on water from the nearby Waikato River to meet urban demand.

¹ Ministry for the Environment. No date. *Environmental Reporting: Area of land cover 1996–2012*. Retrieved from <https://data.mfe.govt.nz/table/2478-land-cover-area-of-land-cover-1996-2001-2008-and-2012/data/> (10 July 2017).

² Auckland Council. 2015. *The Health of Auckland's Natural Environment in 2015. Auckland: Auckland Council*. Retrieved from www.aucklandcouncil.govt.nz/EN/planspoliciesprojects/reports/Documents/stateofenvironmentreport2015.pdf (13 June 2017).

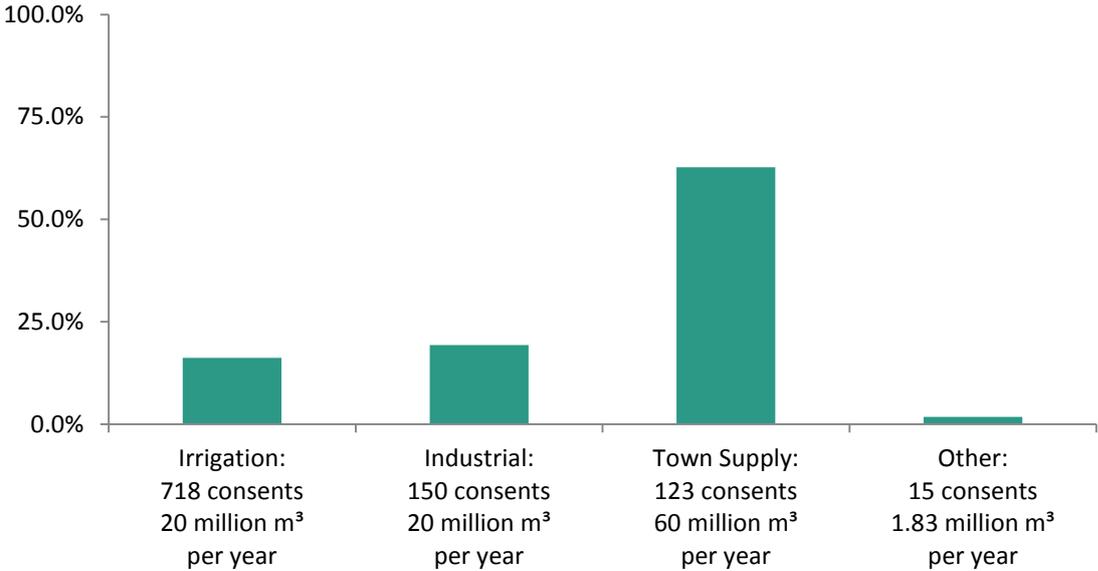
³ See Land, Air, Water Aotearoa. No date. *Auckland region: Water quantity*. Retrieved from www.lawa.org.nz/explore-data/auckland-region/water-quantity/ (13 June 2017).

Figure 1: Major water bodies in the Auckland region



Source: Ministry for the Environment

Figure 2: Water take consents by primary use in the Auckland region



Data source: Land, Air, Water Aotearoa

Review methodology

The information and analysis contained in this report are based on evidence collected from a questionnaire completed by Auckland Council (the Council), a series of interviews and panel discussions with relevant parties, planning documents and associated reports, and the Ministry for the Environment's ongoing relationships and projects across the region. The overall review team consisted of officials from the joint Ministry for the Environment and Ministry for Primary Industries Water Directorate with the assistance of two independent consultants who are both certified hearings commissioners with more than 30 years of experience in freshwater management.

The review team conducted a series of panel discussions with Council executives and elected councillors, senior Council staff, tāngata whenua representatives and stakeholder representatives. Additional interviews and panel discussions were held with representatives from national sector organisations. Following each meeting, attendees were given the opportunity to revise or supplement the meeting notes to ensure their views were recorded accurately.

While the review team has made efforts to confirm information where possible, much of the information included in the review is based on the accounts and perspectives of those involved and often cannot be verified independently.

Stakeholder and tāngata whenua representatives did not necessarily speak with mandate as official representatives of their organisation nor are they presumed to represent all in their wider communities. They were, however, primary sources with direct experience of the Council's work.

Because of varying regional contexts, some issues are considered more or less relevant in different regions. Therefore, some topics that appear in other regional chapters but that were not raised by the Council, iwi and hapū or stakeholders in this region have been omitted from this chapter.

Regional context of water planning

Water management in the Auckland region faces additional complexity because of the blend of rural and dense urban areas. Waterways often flow through multiple land uses including: native forests, agricultural, suburban and urban. As a result, the Council says it is reluctant to target any single zone as being responsible for improving water quality. The Council says it is generating a 'road map' where everyone along the route is given tasks to accomplish towards improving overall water quality.

By land area, a large proportion of the Auckland region is rural. The Council says it has numerous existing work streams around rural water quality and land use. The Council reports that almost all dairy land in the Auckland region is fenced. Farmers in the region face peer pressure to achieve environmental standards.

Auckland Council says its main concerns for water planning are urban sprawl and the high rate of growth. The Council says that more than 12,000 hectares of land are needed to accommodate growth. Provision of infrastructure to service new and intensifying growth areas is a practical and financial challenge and places stress on freshwater resources.

In developing greenfield sites, the Council says it has made a philosophical change from big pipe infrastructure to water sensitive design, which aims at preserving and enhancing freshwater systems and mitigating effects at source, if possible, which leads to a more decentralised management approach. Mitigation measures include a range of devices, including rain gardens and rainwater tanks. The goal is to provide for growth in a manner that will not only prevent further degradation but improve conditions.

Brownfield development has historically proven more challenging for the Council, in particular, in areas with combined wastewater and stormwater networks. In these areas, the Council says it has placed emphasis on the use of enlarged interceptor systems to manage wastewater overflows as part of long-term infrastructure upgrades. The Council expects these required infrastructure interventions to cost upwards of \$2 billion.

Existing plan

The new Auckland Unitary Plan replaces the former Regional Policy Statement and 13 district and regional plans. An independent hearings panel heard public submissions from September 2014 to May 2016. The Auckland Unitary Plan is now operative in part.

The Council has for some time placed emphasis on the integration of land use and the management of the freshwater environment, including through requirements to avoid, remedy, mitigate and offset adverse effects from development. This approach has been reinforced in the Auckland Unitary Plan and, for the first time, regional and district provisions could be fully aligned.

The Auckland Unitary Plan objectives require maintaining freshwater and coastal systems, where they are excellent or good, and enhancing them where they are degraded. The Council considers that it establishes freshwater objectives and policies that are not inconsistent with the National Policy Statement for Freshwater Management (NPS-FM). Because the plan requires the same outcomes for the marine area, there is a clear link to consider freshwater and coastal outcomes simultaneously.

Some of the main shifts in the Auckland Unitary Plan from previous plans are the provision of the same protection status for intermittent streams as for permanent streams, new provisions to manage frequently occurring peak flows (a major source of erosion), requiring run-off from high traffic roads and car parks to be treated, and using redevelopment opportunities to improve water quality and stream health. The Council reports that these provisions indicate the current direction it is taking as it strives to meet NPS-FM objectives and that of raising Auckland's freshwater bodies above national bottom lines.

Stakeholder views

Like the Council, stakeholder representatives we spoke to referenced the high population density and growth in the region as major challenges. They listed other challenges as being the large number of small streams and the effects of land use being felt mostly in the marine area, which they consider makes it more difficult to build a discussion about fresh water. The public is primarily focused on the marine environment and is perceived to have far less interest in freshwater issues. The stakeholder group also noted that Auckland receives a large quantity of water from the Waikato River, so many stakeholders are involved with discussions there.

They said that, before the NPS-FM, the Council had made previous catchment management efforts in the Hōteio area. Although farmers were upset by the outcomes, it set the scene for engagement now and there is general buy in among farmers that work needs to be done.

Agriculture representatives we spoke to noted that Auckland is one of the few regions where the dairy industry is declining due to the high rate of urban growth and increasing land values.

Approach to implementing the NPS-FM

Progressive implementation programme

As a unitary authority, the Council reports that it has varied mechanisms to implement the NPS-FM. The Council says that it takes a holistic approach and intends to implement the NPS-FM through a range of tools, including capital works, bylaws, education and behaviour change programmes, incentives and so on. Although it notes that the specific mix is still to be determined.

It considers that its approach is 'agile' and is outlined in the Progressive Implementation Programme update of December 2015, as publicly available on the Ministry for the Environment website. The Progressive Implementation Programme is likely to be updated before the end of 2017 to further articulate its approach.

From a planning perspective, Auckland's Unitary Plan process has adopted water-related provisions from the NPS-FM. It contains an interim freshwater quality guideline (presence and sensitivity of macroinvertebrates in streams in different land use) and water quantity allocation guidelines. As a unitary regulator, these provisions target all scales of development, and can be applied across the resource consenting process, as well as standards for new assets to be vested to the Council via private development.

The Council's current focus is on obtaining a baseline of information about the current state of water resources in the region before embarking on broader community consultation on how objectives might be further expressed and achieved at a freshwater management unit (FMU) level.

The Council says that a review of the initial implementation activity was undertaken in February 2016. As a result, new organisational arrangements have been put in place for the 2016/17 financial year. The Council says that leadership of NPS-FM implementation has been passed to the Healthy Waters Department, which leads the new Wai Ora – Healthy Waterways Programme. This is a cross-Council programme supported by other Council departments, such as the Natural Environment Strategy and the Research and Evaluation units, as well as Council Controlled Organisations (CCOs). As a result of the shift of the leadership of the NPS-FM implementation to the formerly known Stormwater Department, it was renamed as Healthy Waters to reflect its new main purpose.

The Council considers that this shift in NPS-FM leadership will encourage a coherent programme of implementation under both the Council's regional and district level functions, as well as accelerating NPS-FM implementation with major infrastructure providers including CCOs.

The Council does not consider the NPS-FM to be a major driver behind its actions. It believes that action should be driven by good decision-making, rather than procedural requirements that may not be fit for purpose, and that it would be following the equivalent processes regardless of the NPS-FM. The Council says it knows that there are challenges and it is not waiting on the NPS-FM to prescribe the approach to achieve water-related outcomes.

National context

Council staff are also mindful of the Government's expectations through the National Policy Statement on Urban Development, the Productivity Commission, the Proposed National Environmental Standard for Plantation Forestry and other similar initiatives affecting the implementation of the NPS-FM. It would like to collaborate with the Government on how these expectations can be reconciled to support NPS-FM implementation but also emphasise the need for central government itself to further initiate those discussions.

Priorities

The Council intends to use the Hauraki Gulf Islands catchment planning initiative as a testing ground for new implementation approaches because of work already planned for the islands by the Healthy Waterways Programme. This test case will provide guidance for a roll out across the region.

The Council recognises that it cannot tackle all of the challenges it faces at once and says it must consider priorities for actions on the ground. Currently, it is placing focus on the growth areas where there is national attention and political pressure to enable growth, which can also cater for improved water-related outcomes.

Priorities may also be influenced by future Treaty of Waitangi settlements, depending on how negotiations progress.

Non-regulatory change

The Council emphasised that its efforts towards freshwater management were not limited to policies and plans under the NPS-FM alone and included non-regulatory efforts. Its focus is not on how to force change but on how to empower stakeholders to change for themselves. Its approach is to build momentum with stakeholders. There has been leadership from a number of industry interests that have undertaken voluntary efforts as a way of enhancing their brands.

The Council observes that the regulatory provisions relating to fresh water in its plans may not be as detailed for specific FMUs as other councils' provisions, but this is not necessarily the best way to judge progress in achieving water-related outcomes in a region like Auckland. The Council believes that it and regional stakeholders have made significant efforts but that these successes have not been adequately shared or recognised.

The Council also considers that NPS-FM implementation cannot be defined as a linear process. Instead, the Council notes it is already in various stages of implementation across different aspects, including input from the broader community. It further notes that many projects are intended to create multiple outcomes; projects that are not explicitly about fresh water may deliver important improvements for regional water bodies. It cites the example of improved public transport infrastructure reducing the impact of roadway runoff.

The Council believes that projects that increase the connection the public has with water will result in greater awareness and concern for water issues. It cites the increasing number of bicycle paths and trails as creating public pressure and promoting engagement and self-management of adjacent waterways.

Stakeholder views

Stakeholders see the Council's implementation as still being primarily in the planning stages. They have not seen detailed plans about what the Council intends to do. They are aware that the process has been slowed by the recent Council restructure, which changed ownership of the programme to a different group.

They are aware that two localised freshwater improvement projects are under way in Mahurangi and Pahurehure.⁴ Some representatives questioned the decision to do more work in Mahurangi because much of the work had already been completed. Pahurehure was noted as one of the worst catchments in the region.

Agricultural representatives emphasised the need to treat urban and rural issues in the same manner. They report that the Council had originally planned to allow urban areas to remain degraded and instead focus on cleaning up the rural areas.

Iwi and hapū views

Hui participants⁵ said they have known for a long time that the NPS-FM would present issues for Auckland because they consider the framework is based more around rural water quality issues, which are not as relevant to Auckland's issues. They say that, because of the relationship with Aucklanders and the coastal environment, it is probably more useful for the conversation in Auckland to focus on receiving environments rather than freshwater bodies.

To date, the Council has focused on addressing water quality at a project level by picking out specific sites to focus on and incorporating water quality interventions in its planned infrastructure development. However, it does not appear to have a cohesive overall strategy that it has shared, and it has not explained how the individual project focus will get it to where it wants to be over time. If the Council has not adequately sized the problem and has an overall plan for implementing the NPS-FM and addressing water issues region-wide, it will not have a clear enough idea of what it is aiming for or what it will take to get there.

Overall, hui participants say that it is difficult to assess whether they think the Council's programme is adequate because they do not have enough clarity about what the plan is. A series of programmes has been set up in the past, but there is some frustration that these programmes keep being watered down, resulting in lowered expectations.

They say that the Council has done a lot of work on freshwater improvement initiatives that are not set out in the NPS-FM itself, such as addressing leaching from landfills and contaminated land, and dealing with stormwater infrastructure. One example highlighted was the east–west road link being developed. This is a project the New Zealand Transport Agency has recently lodged with the Environmental Protection Authority and that mana whenua have been working on with the Council and Auckland Transport that involves building a new road along an area of foreshore adjacent to historic landfills. The plan involves using the road construction as a way of addressing water quality by building contaminant management in to the road design.

⁴ The Council reports these initiatives were undertaken as part of former activities that started before the NPS-FM framework.

⁵ During our NPS-FM Implementation Review visit to Auckland, we met with individuals who are mana whenua in the Auckland region. This was a small group, and their comments may not represent the views of all iwi in the region.

Achieving the objectives of the NPS-FM

Setting freshwater management units

Council staff report that 10 FMUs have been defined. FMUs in Auckland have been determined based on common marine receiving environments. This approach reflects the small size of Auckland's streams and the focus of stakeholders on marine water outcomes. The Council considers that NPS-FM outcomes will simultaneously have to address the widespread degradation of marine areas as far as the degradation is caused by land-based activities.

Values and objectives

The Council says that community pressure over swimability is more of an issue in marine waters than most freshwater bodies in the Auckland region. The primary swimming areas for Auckland are either coastal or in reserves with high water quality that is already acceptable for swimming. The Council is monitoring for *E. coli*, and a review of the safe swim programme is currently under way.

The Council is working to include Māori values in project planning through a framework based on the mauri model. It has an ongoing project to connect the qualitative measures of mauri to scientific parameters.

Limit setting and allocation

The Council says it does not want to set limits where these do not take account of the interaction between objectives or the reality of how such limits might be achieved. It does not want numbers to drive priorities; it prefers to focus on the goals and make best efforts in conjunction with the various interests rather than setting numerical limits that are not supported with feasible approaches to achieve them. It considers it is consistent with the central government's view that it is important to determine the implications before setting limits, including how stakeholders view the achievement of particular objectives.

The Council says it will approach limits through better management practices rather than first choosing a specific numeric limit. Rather than focusing on a potentially arbitrary endpoint, the Council prefers to focus on finding ways to leverage change, with a view to future limits (or their proxies) being set with more confidence.

Stakeholder views

There was general concern amongst stakeholders we spoke to about repeated changes to the NPS-FM. They believe that policy should set standards for outcomes but not for the means to achieve those outcomes. The fear of future policy changes is seen as hindering planning and discouraging proactive voluntary improvements.

There was concern that future limits could have impacts on long-term infrastructure development plans. Infrastructure planning is determined decades ahead based on existing consents and expectations for growth, but the uncertainty around future limits and allocation makes planning more difficult. The stakeholder group expressed concern about how to model impacts and the effects that modelling would have on limit setting and allocation.

The group perceived a conflict between the directions of the NPS-FM and the NPS on Urban Development Capacity. The requirement to 'maintain or improve' water in the NPS-FM is seen as potentially incompatible with the requirement to push growth under the NPS on Urban Development Capacity. Group members were sceptical that it would be possible for the city to grow, intensify and urbanise while maintaining water quality. The apparent conflict creates uncertainty and makes planning more difficult. The term 'overall' was raised as a possible route to reconciling the requirements, but the group noted that this would need further discussion and, most likely, legal review.

Iwi and hapū views

Hui participants said that the marine spatial planning process in the Hauraki Gulf has provided lessons that may be relevant in reflecting tāngata whenua values in fresh water. In this process, kaitiakitanga was originally recognised as a separate value from others (eg, industrial or rural use values) but is now seen as being a concept that underpins all the other values.

Some of the nationwide examples of tools for identifying and reflecting tāngata whenua values may be of limited use in Auckland, for example, cultural health indices that are designed to work for large river systems rather than small streams.

Community engagement

Engagement strategy

The Council is currently working on an engagement strategy for NPS-FM implementation. The community that Council needs to engage with is diverse, and various stakeholders are involved at a regional and local level. The Council notes that a number of avenues have been used to gather the community's views on environmental outcomes including water outcomes, such as input on various plans (eg, area plans, the Long Term Plan, Auckland Unitary Plan or asset management plans). Engagement will involve local boards, CCOs, community trusts and other existing groups.

A new Wai Ora Partnerships team within the Wai Ora – Healthy Waterways Programme will lead outward engagement for the NPS-FM.

Stakeholder views

Overall, the stakeholders we spoke to reported that the public has not been engaged in the process to date. However, they note that it may simply be too early in the process and there is little point in going to the community until there is something concrete to discuss. The Council has presented to the local boards, but it is not clear how much information has filtered outwards. The stakeholder group considers the local boards should theoretically be good representatives for the public.

The group discussed ways Auckland could approach engagement in the context of the process used in the Waikato Healthy Rivers Wai Ora Programme. The group representatives were concerned that Auckland would consider using such an approach. Some representatives felt that a fully collaborative process would be impossible given the number of stakeholders in the region. Agricultural representatives were more supportive of a less formal consultative strategy that stopped short of collaboration.

A rural advisory panel and a forestry liaison group are two examples of fora that exist to allow regular consultation between rural stakeholders and the Council.

CCOs, such as Watercare and Auckland Transport, are included in NPS-FM engagement; however, the stakeholder group said the precise role of these CCOs is unclear. Being CCOs can limit their ability to be engaged and influence decisions as a stakeholder in some ways. For example, they cannot make submissions on proposed plans as other stakeholders would.

There was scepticism among the representatives that the public would be as interested in freshwater issues compared with marine areas. One person suggested that integration of the freshwater and coastal plans would help build better interest. There is common acknowledgment of the link between the freshwater catchment and the coastal values.

Engaging with iwi

The Council says that the region has 19 iwi and expects central government to have signed Treaty of Waitangi settlements with many over the next five years. The Council believes that the Kaipara Harbour catchment area may follow a similar Treaty of Waitangi settlement process to the Waikato River.

Iwi are already included in Council decisions via the Independent Māori Statutory Board and the Mana Whenua Kaitiaki Forum. The Council is investing in relationships now so as to be better placed to collaborate with iwi later when settlements have been made with the Crown. Relationships are expected to evolve over time.

The Council describes iwi involvement and impacts as inherent in every discussion. However, while iwi participation was taken as assumed, the Council is still defining the form and extent of participation.

The Council is building agreements with individual iwi and hapū to establish how they would like to be involved in resource planning. It anticipates that there will be variation between the different groups.

» We have to involve iwi. It is the standard. It is not up for debate. «

Auckland Council
staff member

Iwi and hapū views

Hui participants say that they now have a greater mandate to engage with the Council on matters wider than just fresh water. That mandate includes issues around governance, harbour management and transport. Given that wider mandate, there should be a conversation happening about the broader strategy for improving fresh water and where mana whenua should be involved.

They say that mana whenua are sufficiently engaged with some areas of the Council and its associated CCOs, such as Watercare, and this provides iwi with a voice. However, there are other parts of the Council, such as Auckland Transport, where further work is required.

Auckland Council also has an independent Māori statutory board. The role of this board is more of a monitoring and auditing one.

Overall, hui participants said that trust and confidence levels between mana whenua and the Council have increased over time.

Capacity and capability

The Council is not concerned about capability and capacity to manage water. It sees its challenge as one of coordinating existing resources better.

It says that capacity and capability are still issues for iwi and some stakeholders who would wish to be involved.

Stakeholder views

Stakeholders we spoke to said they were generally impressed with the capacity and capability shown by the Council's Healthy Waters Department.

Iwi and hapū views

Hui participants we spoke to said that the Council has a much bigger range of people it needs to reach through engaging on fresh water, but it is also better resourced than other councils. However, in the past, too much funding has been put towards expensive projects that were unnecessary because they simply told people what they already knew (ie, studies that identify that water quality is degraded).

The hui participants said that they are well set up to deal with issues relating to water and the implementation of the NPS-FM.

Information

The Council reports that it has ample data for planning. Its primary challenge is to compile the information from different areas of the Council and present it in a way that is transparent and useful, both to the Council and externally.

The Council's Research and Evaluation Unit is working on a portal to collect and share data both internally and externally. However, the Council has a large volume of data and it is still unclear what information is necessary to include in freshwater objective and limit setting, in terms of what would be useful to people or what future research is necessary. The work on the Hauraki Gulf Islands is intended as a case study to identify information and accounting needs.

Stakeholder views

The stakeholder group was unsure as to the state of knowledge within the Council but suspected that there were not enough monitoring sites. One stakeholder noted that they have provided information to the Council in the past, but there is little real-time information available or knowledge about base states.

Conclusion

The following are the views of government officials about NPS-FM implementation in the region.

- We acknowledge that a lot of work has been undertaken by the Council to achieve better freshwater outcomes, and that the NPS-FM is one of several competing regional and national priorities for Council time and resources. The Council has made progress in terms of embedding NPS-FM-relevant provisions into the Auckland Unitary Plan (2016).
- However, the stakeholders we spoke to are concerned that they have not seen detailed plans of what the Council intends to do to implement the NPS-FM in its entirety.
- We understand the Council's current focus is on obtaining a baseline of information about the current state of water resources in the region before embarking on broader community consultation on how objectives might be further expressed and achieved. The NPS-FM requires councils to set objectives and limits as outlined by Part CA, and linking progress to this approach is encouraged.
- The Council must give effect to the NPS-FM as a regulatory instrument under the Resource Management Act 1991. The NPS-FM clearly requires councils to set objectives and limits using the process outlined by Part CA. In doing this, they need input from the community and to involve iwi and hapū.
- Although many activities are under way that are consistent with achievement of better water outcomes, we encourage the Council to further articulate its implementation plans.
- The Council appears to have sufficient capacity and capability to undertake implementation, including experienced staff, a good information base and good relationships with stakeholders and mana whenua.
- With the new Wai Ora – Healthy Waterways Programme, the Council should have internal momentum to progress implementation of the NPS-FM as required.