



## **Submission of Civic Trust Auckland**

### **Freshwater Consultation 2016**

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### **Civic Trust Auckland**

Civic Trust Auckland (CTA) is a non-profit public interest group, incorporated in 1968, with activities and interests throughout the greater Auckland region.

CTA makes submissions on a variety of issues, both with regard to Auckland, as well as the country as a whole.

The first two objects of our Trust are:

- a) To promote the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers (including their margins), associated flora and fauna, and protection of this natural character from inappropriate subdivision, use and development,
- b) To promote the maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers,

- 1.** The health and sustainability of New Zealand's freshwater resources are important for our country's future, for economic, environmental, tourism, social and cultural reasons.
- 2.** Currently many of our rivers and lakes have poor water quality and need to be improved, as a matter of urgency.
- 3.** Water quality standards should provide for the ecological health of our water bodies.
- 4.** CTA supports the target for all water bodies being safe for people to swim in, play in, and eat food from. A wadeable standard is not a high enough standard.
- 5.** Limits need to be set that will maintain the life-supporting capacity of freshwater throughout the country, along with acknowledging the biophysical limits of these bodies of water and the effect of intensified land use.
- 6.** The National Policy Statement should provide direction on appropriate limits for nitrogen and phosphorus.
- 7.** There should be a clear statement that in water quality planning, allocation of the assimilative capacity of nutrient loads needs to occur in the context of effective environmental limits that are set to protect ecological health. In the context of regional plans, limits should not be a matter for discretion.
- 8.** CTA supports changing the Resource Management Act to provide that consents to take and use water or discharge contaminants to water or to land in a manner that will result in contaminants entering water may only be granted where they would comply with freshwater limits in plans (or, where a water body is already over-allocated, that granting the consent would be consistent with achievement of a freshwater target).
- 9.** Further direction in the NPS as to how limits and targets must be incorporated into plans, specifying that activities that do not comply with a limit or are not consistent with achievement of a target are to be treated as non-complying or prohibited activities.
- 10.** CTA supports a regulation excluding dairy cattle on milking platforms from water bodies by July 2017.
- 11.** We understand that third party grazing should be able to comply with such a regulation by 2020, and that both beef and deer on plains (0–3°) should also be required to comply by 2020 and on lowland/rolling hills ( 4–15°) by 2025.
- 12.** We request that the opportunities for practical high country stock exclusion be addressed in new national regulations.
- 13.** CTA supports the proposals that require good management practice and technical efficiency standards for water use and nutrient management and the provisions for defined opportunities for applying these efficiency standards. We support the LAWF recommendation that such requirements should be mandatory for all catchments.
- 14.** We support proposal 2.6 to "increase the ability of councils to recover costs from water users for monitoring, enforcement, research and management". This should

enable more and better monitoring and enforcement by councils.

**15.** We oppose the proposal to allow the Minister for the Environment to delay an application for a Water Conservation Order if there will be a conflict with a regional planning process. We do not support the streamlined planning process.

**16.** CTA supports measuring water quality by catchment, rather than region. We agree that the Macroinvertebrate Community Index should be adopted as a mandatory water quality standard.

**17.** CTA supports the proposal to develop guidance on different methods of addressing over-allocation of water quality and/or quantity, if technical efficiency standards and good management practice standards are insufficient.

Date of submission: 22 April 2016

Signature:



A handwritten signature in black ink that reads "Audrey van Ryn". The signature is written in a cursive, flowing style.

Audrey van Ryn  
Secretary, Civic Trust Auckland