



31st October 2019

Via email: consultation.freshwater@mfe.govt.nz

Dear Madam / Sir,

SUBMISSION: ACTION FOR HEALTHY WATERWAYS

Thank you for the opportunity to present our submission in relation to the Action for Healthy Waterways proposal. Effective freshwater management is a primary concern for our district, as we take our role as tiaki of some of New Zealand's most iconic bodies of water extremely seriously. Our residents are passionate about the need to ensure our lakes and waterways are protected and pristine, for future generations. We are keenly aware of the risks that contamination and mismanagement present within our catchments; endangering our wildlife, our amenity, our economy and our health. As one of the fastest growing districts in New Zealand, the pressure placed on our infrastructure and funding mechanisms is considerable; the demand for continued development with water views, relentless.

Effective freshwater management is at the heart of the community and visitor experience for both QLDC and the national tourism sector - it must be an absolute priority.

As such, the Queenstown Lakes District Council (QLDC) strongly supports the need to initiate change that will have a long lasting, inter-generational effect. QLDC supports the governments three key objectives:

1. Stop further degradation of New Zealand's freshwater resources and start making immediate improvements so that water quality is materially improving within five years.
2. Reverse past damage to bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation.
3. Address water allocation issues having regard to all interests including Māori and existing and potential new users.

QLDC broadly supports the direction of the changes proposed and endorses the concept of Te Mana o te Wai and further details are included in the attached submission. It should be noted that the provision of a short timeline to respond to this proposal which also ran in tandem to another of other critical NPS consultation processes has presented both QLDC and interested parties in the district with a significant challenge. During this period a local body election has also occurred, providing insufficient time for QLDC to canvas the opinion of its new elected members. QLDC requests that MfE consider local context when planning future consultation programmes and provides an acceptable timeline for a comprehensive response to be prepared in future.

This submission reflects the position of officers and has not been ratified by full council. Council staff ask to be invited to present this submission at any hearings that result from this consultation process.

Thank you again for the opportunity to comment.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Mike Theelen', with a long horizontal flourish extending to the right.

Mike Theelen
Chief Executive, Queenstown Lakes District Council

1. INTRODUCTION

- 1.1 QLDC broadly supports the direction of the changes proposed to freshwater management and welcomes the opportunity for councils to have clear, established priorities to guide decision-making.
- 1.2 QLDC supports the prioritisation of health and wellbeing of waterbodies and ecosystems (and of the essential health needs of people), ahead of other social, economic and cultural wellbeing priorities.
- 1.3 QLDC supports the strong signals these priorities provide to councils, developers and farmers in relation to water quality responsibilities.
- 1.4 QLDC notes the short timeline for responses to these proposals and encourages MfE to provide longer deadlines for important consultations such as this in future.

2. MAORI VALUES

- 2.1 QLDC fully supports the strengthening of Māori values within freshwater management and endorses the concept of Te Mana o te Wai. Whilst this will aid prioritisation and decision-making, we do anticipate challenges in practical application, given the potential competing interests of recreational users, agricultural interests, transport providers, tourism operators and core infrastructure provisions.
- 2.2 QLDC welcomes the opportunity to improve the reflection of tangata whenua values in freshwater management and looks forward to further detail being available as to mechanisms for this to occur.
- 2.3 Furthermore, the elevation of the status of mahinga kai to a 'compulsory value' as opposed to an 'other national value' appears to be an appropriate development.

3. URBAN WATER QUALITY GROUP

- 3.1 QLDC is highly engaged with the work being undertaken by the Urban Water Quality Group in the preparation of the Urban Water Good Management Practice Guidelines.
- 3.2 As these are nearing finalisation, QLDC requests that any changes proposed by MfE are fully aligned with the group's guidelines.

4. POLICY IMPLICATIONS

- 4.1 QLDC continues to support the requirement to utilise an integrated management approach in relation to the effects of land use and development on freshwater. As such, QLDC is committed to the requirement to include freshwater objectives, policies and methods in its District Plan.

4.2 QLDC requests greater clarification as to the relationship between the NPS Freshwater and the NPS Urban Development, to ensure that te mana o te wai isn't placed under threat from impacts of growth and intensification. In the Queenstown Lakes District, the vast majority of development is critically close to a body of water.

4.3 It's further requested that greater consideration is given to the integration of other NPS documents currently under development i.e. Urban Development and Highly Productive Land. The relationship between the directive provisions of these documents is unclear, and may increase the risk of competition for resources and litigation.

5. MONITORING AND REGULATION ACTIVITY

5.1 QLDC applauds all efforts to improve management of freshwater and notes that its own environmental management guidelines for land disturbance activities aligns with this proposal.

5.2 QLDC supports the changes proposed to regional council activity, monitoring and regulation. However, QLDC strongly encourages central government to ensure that sufficient funding and resources are available to enable the change to be delivered effectively, consistently and reliably.

5.3 QLDC further supports the requirements for regional councils to assess and report on freshwater management on an annual and five yearly basis, including information on known and likely causes of trend information.

5.4 QLDC highlights the need for the development of a fully co-ordinated water quality monitoring model, to ensure delivery of a holistic approach to managing urban and rural water quality. Provision of resources and funding from central government may be required to enable this transition.

5.5 QLDC notes that the provision and gathering of comprehensive data will be essential to the success of the freshwater proposals. As such, it is requested that central government further prescribes monitoring and data responsibilities for all key parties i.e. City, District and Regional Councils, NZTA and DoC.

6. WASTEWATER

6.1 The Queenstown Lakes District faces a considerable challenge in the management ageing septic tank systems and waste water systems that skirt our lakes. The resources to fund and develop appropriate, resilient assets are not readily available and this requires further consideration.

6.2 In light of this, QLDC requests that the Proposed 2009 National Environmental Standard for On-Site Wastewater is refreshed and enforced, to prevent the proliferation of poorly maintained septic tanks and on-site disposal fields. Effective maintenance will prevent contaminated water from entering the water supply and freshwater bodies following storm events..

6.3 QLDC further requests clear guidance as to the residential density threshold for the installation of a reticulated wastewater system. Such guidance would help facilitate the transition of smaller communities from on-site wastewater to reticulated wastewater effectively.

7. ADDITIONAL POINTS

7.1 QLDC requests further guidance in relation to bare land monitoring responsibilities and the use of zoning/designations to “avoid all, or certain types of development” in areas where the effects on freshwater could not be adequately managed.

7.2 The lakes within the district are at continued risk from invasive and exotic weeds, posing a risk to the recreational reputation of the district. Whilst QLDC has made considerable commitment to tackling the problem, it’s requiring significant investment and infrastructural adaptation in relation to micro-filtration. As such, QLDC requests further support, funds and resources from MfE in tackling this challenge.

7.3 QLDC requests greater clarity in relation to exemptions for wetlands constructed for the purpose of stormwater or landscape management. Should such wetlands be able to be removed, even if they have become important for water quality and ecology over time?

7.4 QLDC requests an adjustment of the specified set backs for stock fencing and sediment management in relation to braided rivers. The currently defined measures may be ineffective within the district’s geographic context.