

**Submission on the  
Draft National Policy Statement for  
Freshwater Management (NPSFM)  
& Proposed National Environmental  
Standards for Freshwater (NESF)  
October 2019**



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# Submission on Draft National Policy for Freshwater Management and Proposed National Standards for Freshwater

## Submitters Details

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## 1. Introduction

- 1.1 This is a submission on the Draft National Policy Statement for Freshwater Management(NPSFW) and the Proposed National Environmental Standards(NESF) for Freshwater.
- 1.2 The Ōpāwaho Heathcote River Network Incorporated (OHRN) is an umbrella organization that facilitates and supports the values, efforts, and needs of our communities along the Ōpāwaho Heathcote River. The OHRN is made up of representatives from eleven community groups in the Ōpāwaho Heathcote catchment and the Avon-Heathcote Estuary.
- 1.3 Our Vision is; 'An ecologically healthy river that people take pride in, care for and enjoy.'
- 1.4 Our Purpose is; 'To facilitate a collaborative network which advocates for the regeneration of the whole of the Opawaho Heathcote River.'
- 1.5 The OHRN provides a voice for local river-care organizations and the communities. It collaborates and advocates with decision making organizations including Christchurch City Council (CCC) and Environment Canterbury (ECan).
- 1.6 The Ōpāwaho Heathcote River, including many of its tributaries, has some of the poorest water quality in the City of Christchurch. The River has a complex catchment which includes part of the Port Hills, industrial areas, and concentrated urban and residential zones.
- 1.7 Like many lowland rivers, the Ōpāwaho Heathcote River suffers from 'urban stream syndrome.' This is an indicator of the cumulative effects of activities and water management within its catchment over the last 150 years. This has resulted in an overall low baseline of ecological, water and sediment quality, and cultural health.
- 1.8 The River's ecological health is under pressure from stormwater discharges contaminated by copper, zinc and a very large amount of suspended sediments from the recent Port Hills fire. Other sources of contamination include sewage overflows from the City's wastewater system. The River flows into the Avon-Heathcote Estuary where its

toxic contaminants can bio-accumulate in filter feeders and hence adversely affect the animal and plant life that depend on them.

## 2. Overall Submission

- 2.1 The OHRN welcomes and supports both the Draft National Policy Statement for Freshwater Management and the Proposed National Environmental Standards for Freshwater with their focus on the important issue of improving our water environments.
- 2.2 We support the fundamental concept Te Mana o te Wai (NPSFM 1.5) and therefore also support the objectives (2.1a to c). In putting the waterbodies first they will be sustained for us all now and in the future.
- 2.3 The focus on improvement of those waterbodies that are currently not of a quality their local communities wish to see, is welcome (Policy 2, 3, 6). The requirement to monitor conditions and identify trends, basing decision-making in science, is strongly supported (Policy 3).
- 2.4 The emphasis on engagement and consultation with communities and tangata whenua is strongly supported (Subpart 1, 3.2 Te Mana o te Wai and Subpart 2, 3.7). The OHRN is a voluntary group that connects local community waterway groups and liaises with local government. We believe that the inclusion of community voices in decisions that impact on them, is essential to good decision-making and supports an integrated catchment approach.
- 2.5 We strongly support Subpart 1, 3.4 Integrated management. For the Ōpāwaho Heathcote the emphasis in this section on urban environments and cumulative effects is critical. In particular subclauses (5) and (6) which require councils to promote the use of existing techniques to reduce the damaging effects of urban runoff on waterways are supported. Local councils are not currently promoting/requiring the use of small-scale green infrastructure, Water Sensitive Urban Design or Low Impact Development sufficiently to achieve ecologically healthy urban waterways.
- 2.6 We would recommend that Subpart 2, 3.6 3b) primary contact sites also includes historic or potential primary contact sites. The NPSFM aims to improve degraded waterways. Urban waterways in particular may have been unsuitable for contact recreation for many generations, but with the long timeframes considered in the NPSFM, regaining contact recreations sites is considered achievable and desirable.
- 2.7 Subpart 2, 3.9, 5a) is too vague. It is reasonable to set long time frames, but timeframes of 'any length or period' do not set a clear path to achieving the desired attribute state. The government has promoted the idea of achieving the waterways we would like to have within a generation. There needs to be an upper time limit set.

- 2.8 Note: sensitive receiving environments are mentioned but do not seem to be defined.
- 2.9 Appendix 2A: The inclusion of sediment in the attributes requiring limits is strongly supported. Sediment is one of the most significant contaminants impacting on the Ōpāwaho Heathcote River.
- 2.10 Subparts 1, 2 and 3 of the NESF are supported.

Thank you for the opportunity to submit.

*G. Hasselman*

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