

Auckland Council Officer Only Submission to the
Waikato Regional Council

**Proposed Plan Change 1 - Waikato and
Waipā River Catchments**

8 March 2017

Auckland Council Officer Only Submission on the Proposed Plan Change 1 - Waikato and Waipā River Catchments

1. This is Auckland Council's Officer Only submission on the Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments.
2. The address for service is Auckland Council, Private Bag 92300, Victoria Street West, Auckland 1142, Attention: Debra Yan.
3. Auckland Council wishes to appear before the Waikato Regional Council to discuss this submission.
4. This Officer Only submission has been approved by the Planning Committee of Auckland Council.

Introduction

1. Auckland Council staff supports the Plan Change as we recognise that water quality is a key issue for the Waikato region. The proposed land use actions and changes to restore and protect water quality are first steps in achieving water quality objectives.
2. The Plan Change will assist and encourage the integrated management of the natural and physical resources of the Waikato and Auckland regions which is important given Waikato River's contribution to Auckland's cultural, social and environmental wellbeing.
3. As the natural environment does not recognise local government administrative boundaries, where practical similar cross boundary approaches are important to ensure that wider catchment effects are considered.
4. Auckland Council staff have identified a particular issue related to stock exclusion and water bodies, that we believe merits similar treatment (where practical) for the operational and policy development of land and water resources. Further clarification is sought on Farm Environment Plans and the Nitrogen Reference Points for subcatchments which overlap the shared boundary.

Stock Exclusion

5. We support stock exclusion from water bodies as a means to reducing contaminant losses from pastoral farm land (Chapter 3.11) however the exclusion only applies to cattle, horses, deer and pigs, not sheep and goats.

Discussion

6. It is well recognised nationally and internationally that the access of stock to the beds of lakes, rivers and streams can cause a range of significant adverse effects on water quality and instream and riparian habitat values. As the main mechanisms for causing damage relate to trampling, pugging or erosion of the bed, bank and riparian margins from stock we believe the exclusion should also apply to sheep and goats.

Recommendation

Auckland Council:

7. Seeks that sheep and goats should also be excluded from access to water bodies, or alternatively delete the identification of types of animals within the rules and insert a clear definition of livestock to include sheep and goats in the glossary. For example the Auckland Unitary Plan (Operative in part) defines livestock as:

*Animals raised for food or other products, or kept for use, especially farm animals.
Includes:*

- *meat and dairy cattle;*
- *pigs;*
- *poultry;*
- *deer;*
- *horses;*
- *goats; and*
- *sheep.*

Water bodies

8. The protection of intermittent rivers or streams is not addressed by this Plan Change. This approach is inconsistent with Auckland's approach to protect intermittent streams.

Discussion

9. The management framework for rivers and streams under the Auckland Unitary Plan now includes provisions for intermittent streams. Intermittent streams are treated the same as permanent streams. The inclusion of intermittent streams within the Unitary Plan provisions represents an appropriate shift in management approach, reflecting the statutory context in which freshwater is to be managed (i.e. the Resource Management Act and NPS-FM do not distinguish between permanent and intermittent streams) and the increased understanding of the importance of intermittent waterways in maintaining healthy functioning downstream waters.

Recommendation

Auckland Council:

10. Seeks the protection of intermittent streams within the Waikato region to ensure consistent (where practical) NPS-FM policy and implementation approaches between Waikato and the southern boundary of the Auckland region.

Clarification

11. *Farm Environment Plans* – clarification is sought on how Farm Environment Plans will be structured where a property or enterprise is situated across the Waikato/ southern Auckland boundary, is there provision for identifying these properties in the current Plan Change?
12. *Nitrogen Reference Point* – clarification is sought on the expectations (in terms of monitoring and compliance) for Auckland Council within the areas in the subcatchments (Whapipi (3) and Waikato at Tuakau Branch (4)) which overlap the Waikato and southern Auckland boundary in terms of nitrogen load limits as defined by this Plan Change. It may be appropriate to exclude these subcatchment areas from the Plan Change as they overlap the southern Auckland boundary.