

Proposed Waikato Regional Plan Change 1, Waikato and Waipa River Catchments

Submission by
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This is my personal submission as a citizen of the Waikato Region.
I could not gain an advantage in trade competition through this submission.
I wish to speak at the hearing in support of my submissions.

Roderick Aldridge

Background – The need for the Proposed Waikato Regional Plan Change 1 (PC1)

Situation

The ecology of the rivers and freshwater have been seriously degraded by changes to the catchment particularly since the 1840s. Forests have been converted to agriculture, rivers have been dammed, floodplains have been cut off by stop-banks, wetlands have been drained, species have become extinct, invasive species have been introduced, (a significant number have become invasive pests), urban areas have been paved over

This has resulted in ongoing erosion, sedimentation, pollution, eutrophication, and other degradation of the catchment. Some of these changes continue, and their effects often continue even when the activities are stopped. Soil keeps eroding, clogging riverbeds and smothering aquatic life, pests keep spreading and multiplying, nutrients and pollutants continue to leach into waterways and groundwater, climate change continues,

Some of these changes cannot be reversed.

It is a dynamic system, changing all the time. When the environment changes the ecosystem changes in response. Once a new ecosystem has become established it can't just be changed back, even if you can restore the previous environment – which you usually can't anyway. For example if a lake becomes eutrophic the previous organisms adapted to low nutrient levels are replaced by those adapted to high nutrient levels. You would have to re-establish the low nutrient environment (next to impossible), ensure the return of the previous organisms which may have become locally or even entirely extinct. Control any undesirable species

The same principle applies to all factors causing deterioration of the health of the rivers.

We need to act swiftly change the factors causing degradation and restore healthy rivers and freshwater bodies as soon as possible before any more tipping points are reached and more ecosystems are irreversibly changed.

Strategy for restoring healthy rivers and freshwater bodies.

Halt the degradation and start restoring as soon as possible.

Change the factors that make the most difference, in the shortest time, bearing in mind the need to be seen to be fair and to cause the least economic and social disruption. Also the need to be able to monitor and enforce the measures.

The changes should happen as soon as possible before further irreversible degradation.

The Plan should give the right incentives – it should promote change for the better. Changes for the worse should be disallowed and penalised.

Measures allowing current activities to continue (grandparenting) should be temporary – to set a limit on degradation processes and give time to change to better practices. It should not be a licence for bad actions to continue at current levels. They should be replaced as soon as possible with measures based on best land use. Changes already made for the better should be recognised in the new regime. Fairness demands this.

Limits and requirements should be tailored at the ecosystem or subcatchment level to promote the most sustainable and productive land use.

The factors causing degradation are clear

Habitat change/degradation, particularly loss of vegetation and resulting erosion.

Pollution and eutrophication

The extraction and disposal of water, often too much and used wastefully, degraded and not properly returned to the environment.

Overview

The Waikato Regional Council (WRC) is to be commended for achieving a consensus of most of too many the interested parties affected by the Waikato and Waipa River Catchments. The resource Management Act (RMA) provides that the PC1 can be challenged, even if complete agreement had been reached.

It is a requirement for the Waikato Regional Council to give effect to the Vision and Strategy under the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, Ngati Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010, and Nga Wai o Maniapoto (Waipa River) Act 2012.

However in an endeavour to reach a consensus the PC1 fails to make the most effective changes soon enough to successfully give effect to Vision and Strategy for the Waikato River.

Issues:

Delayed implementation. The changes need to take effect as soon as possible, but few actual changes are required in the first stage – PC1. Instead most current activities and practises are able to continue for 10 years “grandfathered” If it is legally possible the PC1 should review point source discharge consents in the first stage.

The most effective changes need to be made in the first stage before further degradation occurs. They will be much more difficult, disruptive and expensive later.

The PC1 should allow the period of the stages to be set progressively to allow changes to happen at the most opportune time.

Setting the levels of harm allowed at current levels allows degradation to continue. It is also unfair to land owners who have already undertaken positive changes. The rivers are already too degraded. The process must be reversed as soon as possible.

Setting the limits as the maximum allowed for permitted activities will result in movement to the maximum, resulting in further harm. 3.11 Freshwater objectives should be defined in terms of what the sub-catchment or Freshwater Management Unit requires to maintain or restore the required water quality, ecosystem health and indigenous biodiversity The values should be set at levels that ensure this. 3.11.2 Fluctuations should be allowed around these levels to allow for extreme events, but improvements in one part should not allow degradation in another.

Thresholds should be defined in terms of the healthy ecosystem that should be maintained or restored. Where this cannot be defined the PC1 should use criteria which include measures such as:

- Natural character (including the condition of the riparian margin).
- Dissolved oxygen (DO)
- Deposited and suspended sediment
- Te Hauora o te Taiao / the health and mauri of the environment.
- Freshwater Macroinvertebrate Health (Macroinvertebrate Community Index).
- Periphyton.
- Cyanobacteria
- Benthic cyanobacteria
- Dissolved Inorganic Nitrogen (DIN) & Total Nitrogen in the tributaries / sub catchments
- Total Phosphorous in the tributaries / sub catchments
- Temperature
- pH
- Toxic heavy metals
- Barriers to fish migrations
- Water flows and levels
- Estuaries

I therefore make the following submission points:

My submission relates to

3.11.1 Values and uses for the Waikato and Waipa Rivers/Ngā Uara me ngā Whakamahinga o ngā Awa o Waikato me Waipā

3.11.1.1 Mana Atua – Intrinsic values

3.11.1.2 Mana Tangata – Use values

I support the provisions

The Vision and Strategy for the Waikato River/Te Ture Whaimana o Te Awa o Waikato

My reasons are:

My vision is also for a future where a healthy Waikato River sustains abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato River, and all it embraces, for generations to come.

My values align with the Mana Atua – Intrinsic values and the Mana Tangata – Use values

I seek the following decision by Council:

Accept the above position

My submission relates to

3.11.2 Objectives/Ngā Whāinga

Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit/Te Whāinga 1: Te whakaoranga tauroa me te tiakanga tauroa o te kounga wai ki ia riu kōawaawa me te Wae Whakahaere i te Wai Māori

By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80-year water quality attribute targets in Table 3.11-1.

I support the provision with amendments

My reasons are:

80 years is too long a period to achieve the target. It can be met sooner if the most effective changes are made as soon as possible before further degradation occurs.

I seek the following decision by Council:

Accept the above position with amendments as outlined

My submission relates to

3.11.2 Objectives/Ngā Whāinga

Objective 2: Social, economic and cultural wellbeing is maintained in the long term/Te Whāinga 2: Ka whakaūngia te oranga ā-pāpori, ā-ōhanga, ā-ahurea hoki i ngā tauroa Waikato and Waipa communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, which enables the people and communities to continue to provide for their social, economic and cultural wellbeing.

I support the provisions

My reasons are:

I agree with the provisions.

I seek the following decision by Council:

Accept the above position

My submission relates to

3.11.2 Objectives/Ngā Whāinga

Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit/Te Whāinga

3: Ngā whakapainga taupoto o te kounga wai i te wāhanga tuatahi o te whakaoranga me te tiakanga o te kounga wai i ia riu kōawāwa me te Wae Whakahaere Wai Māori

Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80-year water quality attribute^targets^ in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute^targets^ in Table 3.11-1.

I support the provision with amendments

My reasons are:

Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, **are not sufficient to achieve ten percent of the required change** between current water quality. 80 years is too long a period to achieve the target. It can be met sooner if the most effective changes are made as soon as possible before further degradation occurs.

I seek the following decision by Council:

Accept the above position with amendments as outlined

My submission relates to

3.11.2 Objectives/Ngā Whāinga

Objective 4: People and community resilience/Te Whāinga 4: Te manawa piharau o te tangata me te hapori

A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural wellbeing in the short term while:

a. considering the values and uses when taking action to achieve the attribute^targets^ for the Waikato and Waipa Rivers in Table 3.11-1; and

b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1.

I support the provision with amendments

My reasons are:

The PC1 should allow the period of the stages to be set progressively to allow changes to happen at the most opportune time. Conditions will change in 10 years. Some changes could be made sooner or different changes may be required.

I seek the following decision by Council:

Accept the above position with amendments as outlined

My submission relates to

3.11.3 Policies/Ngā Kaupapa Here

I support the provision with amendments

My reasons are:

The policies should be amended in line with the above

Strategy for restoring healthy rivers and freshwater bodies.

I seek the following decision by Council:

Accept the above position with amendments as outlined
