

8<sup>th</sup> September 2004

Biodiversity Team  
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**CHRISTCHURCH**

## **Submission on the Draft Biodiversity Strategy**

### **Congratulations**

The Trust congratulates the Councillors and the Officers of the City of Christchurch on the production of this excellent draft strategy.

The strategy is very timely. It is a crucial mechanism for planning and operating our City in a more sustainable way as is desired by the people of Christchurch and is required by the new Local Government Act.

The Trust looks forward to working with the Council on implementing those parts of the Strategy which affect the Avon Heathcote Estuary directly or indirectly through affects on the Heathcote and Avon Rivers. It is clear that most land uses in the City have potential affects on these waterways and hence on the Estuary.

The Avon Heathcote Estuary and its two rivers are defining icons of the City of Christchurch. The Estuary is the largest semi-enclosed shallow estuary in Canterbury and is one of New Zealand's most important coastal wetlands. For these reasons they warrant greater recognition and more appropriate provision in the City's Strategy for Biodiversity.

The Trust is keen to develop further partnership arrangements with the City to deliver specific environmental programmes that will help achieve the Trust's Goals as set out in its Deed. Such partnerships are a relevant and important means of achieving the Community Outcomes that provide the foundation of the new Long Term Community Plan. The Plan will set out the priorities and budgetary allocations of the Council.

### **The Avon Heathcote Estuary Ihutai Trust**

The Avon Heathcote Estuary Ihutia Trust was established in 2002. The Trust has an elected Board. The City Council, Environment Canterbury and Ngai Tuahuriri Runanga of Ngai Tahu have members on the Board as of right. The Trust has formal memoranda of understanding with the City and with Environment and receives generous financial and staff support from both Councils.

The Trust has in its Deed six objects which guide its programmes of action

1. *To pursue for the Avon-Heathcote Estuary Ihutai ("the Estuary") the preservation of its natural and historic resources to maintain their intrinsic values, and to seek the*

*protection of these resources, including restoration and enhancement, for their appreciation and recreational enjoyment by present and future generations.*

2. *To achieve healthy working ecosystems for the Estuary and its catchments through “Integrated Environmental Management”, meaning a systematic effort to understand, through interactive interpretation and analysis, the linkages between ecosystems, resources and people.*

3. *To involve individuals, community groups and statutory agencies in learning and practicing the principles of integrated environmental management so that all parties responsible for the management of the Estuary and its resources apply these principles.*

4. *To strengthen relationships between mana whenua, communities, interest groups and statutory agencies for the better management of the Estuary and its resources.*

5. *To acquire, publish and use information and knowledge of the Estuary through research and monitoring, public education, contributing to planning, and any other actions that are necessary for the integrated environmental management of the Estuary, its resources and its catchments.*

6. *To increase public recognition, understanding and appreciation of the qualities and values of the Estuary.*

The Trust's objects are thus broader than biodiversity. The Trust is actively engaged with officers of several sections of the Council. One of the Trust's interests is therefore to see increased coordination of programmes and activities across the sections of Council. The Trust supports the appointment of a coordinator as is proposed in the draft strategy. To be effective this person will, however, need to coordinate the biodiversity-related programmes across all working groups within the Council as well as with the wider community. The Trust looks forward to working with the coordinator.

## **The Estuary and its Rivers A key component in a Biodiversity Strategy**

The Trust considers that the draft strategy would benefit from taking a more ecosystem-wide approach to planning and delivering improved biodiversity. In the draft there is a very strong focus on land based biodiversity and “sites”. Greater emphasis needs to be given in the strategy to biodiversity improvement for the two Rivers and the Estuary. Moreover the very strong causative links between land cover and land uses and the health of water bodies warrants greater attention in the Strategy's programme of actions and resourcing. Policy 6.3.5 of the City Plan is relevant in this regard. *To avoid urbanization of land which is of outstanding landscape quality, is ecologically significant, or which distracts from the margins of waterways and coastline.* More stringent land use controls through the City Plan and through catchment-based settlement structure plans are needed if the headwaters of the rivers are to be adequately protected. Reductions in the amounts of sediment and other pollutants reaching waterways will also require significant changes to practices administered by other sections of the Council. The Biodiversity Strategy needs to provide leadership and a creative approach to facilitating these Whole of Council programmes.

The Estuary lying as it does downstream of the City and receiving all its waterborne pollutants is itself a critical “site” for monitoring the health of the City organism. An

integrated monitoring programme with the City, Ecan and the Trust as partners needs to be developed and resourced.

In addition the Estuary provides many practical resources and desirable amenities for City Folk. The City's Biodiversity Strategy should therefore identify in a coherent way the Estuary's environmental values and the programme of measures planned for the protection and enhancement of its aquatic life. The Trust is keen to work alongside the Council to achieve this.

## **The Trust's programme of Action Opportunities for joint work**

The Trust's priorities for action are set out in its Ihutai Management Plan. The Plan was published in draft form earlier this year and submissions were invited. The final document will be available in October.

The Plan has four major Goals under which specific performance targets are listed. There are in addition four overarching activities, including one of adopting an Integrated Environmental Management Approach

The four Goals are

- GOAL 1:**        *Communities working together for the better management of        the Estuary*
  
- GOAL 2:**        *Healthy ecosystems are sustained in the Estuary and its surroundings  
See appendix A for the Targets listed under this Goal*
  
- GOAL 3:**        *Wise management of open space*
  
- GOAL 4:**        *Safe and balanced recreation*

The Trust will be working closely with the City and with Ecan over the next three months to develop implementation plans for the actions listed in the Ihutai Plan. Clearly there are some synergies and opportunities for some joint programmes between the Ihutai Plan and the Biodiversity Strategy. The Trust will also be seeking funding from sponsors. Partnerships between the City and the Trust for some activities may attract greater sponsorship and enable biodiversity improvement to be achieved sooner.

## **Specific page by page comments**

- *Introduction page 5.* The Trust considers that the draft is excellent as far as it goes. We would, however like to see a more integrated and broader ecological approach linking land to water and to see specific proposed activities and budget allocations for the Estuary that reflect its importance both to the Nation and to the City. The Trust is keen to work with the Council to achieve this.
  
- *Strategy context diagram page 6.* There would appear to be too many separate strategies. It is time to put more effort into a Whole of Council approach and to link natural environment strategies with the other programmes of Council while have a strong determining affect on the residual quality of our biodiversity.
  
- *Looking Ahead Pages 8-9.* The Avon Heathcote Estuary appears to have fallen between the "stools" of a Waterways and Wetlands section and the Coast section. Now that the sewage discharge of the City is to be removed from the Estuary it is time for the

Council to give in its documents the Estuary the recognition it deserves. The Avon Heathcote Estuary warrants no less attention and provision than the tremendous work that the Council has done in recent years to enhance the Styx river system.

- *Map of Major opportunities pages 10-13.* The note on the Estuary and the reference to working with the Trust is acknowledged with thanks.

On page 9 the limited aerial extent of the green zone in the Estuary needs explanation. The whole of the Estuary will be substantially enhanced by the removal of the Bromley discharge. The removal of the effluent will result in a huge reduction of nutrients and a reduction in bacteria and viruses. It is hoped there will be a significant reduction in sea lettuce growth. Fish will also be able to repopulate the Estuary once the toxic ammonia discharge from the Bromley treatment plant ceases.

The Tip of the Brighton Spit is an area where there is an opportunity to increase its current high value for birdlife. This is an internationally important site for migratory.

- *A picture of our Biodiversity pages 14-15.* What is presented is very much a terrestrial typology. The Rivers and the Estuary warrant a mention in the scheme of things.

- *Benefits to Society of a healthy ecosystem page 21* The crucial role of the Estuary and the Rivers in receiving and treating all the land runoff of the City warrants specific acknowledgement in the list of ecosystem services.

- *Ki Uta Ki Tai page* The Trust strongly supports this approach. The Trust has defined its area of membership and activities to include the catchment areas of the Avon and Heathcote rivers including their headwater streams and springs. The Trust is working closely with Ngai Tahu in the delivering its programmes. Specific funding needs to be set aside to allow environmental values of importance to Ngai Tahu to be identified and for co-management to be developed and sustained. For example with respect to mahinga kai species.

- *Christchurch Snapshot page 29* The Estuary warrants a mention in this catalogue of attributes to the City. It has an area of approximately 700 ha.

- *Fish pages 40-41* The Trust endorses the identification of pollutants as a major factor in the ability of fish to survive in the City's waters. The reduction of pollutants is a priority area of activity for the Trust. The adverse effects on juvenile fish of ammonia in the Bromley discharge should however be recorded. Under the recommendations the Trust would like to see identified, the need for monitoring of fish in the Estuary both before the Bromley sewage discharge is removed and a few years afterwards. Also the need for monitoring fish species in the rivers.

- *Freshwater Invertebrates page 42-42* The decline of invertebrates in recent years as a result of pollution from land uses will require a sustained commitment across Council working groups if it is to be halted and reversed. The Trust intends to advocate strongly for this to be a major area of Council activity. This plan should give greater emphasis to the problem and to how it will be addressed across Council.

- *Anima land plant pests page 46-49* Pest and weed control is becoming an increasingly important issue in the wetlands adjacent to the Estuary and the lower reaches of the Avon and Heathcote rivers. The Trust may be able to have its members assist with these control activities. It is understood that hedgehogs and pukeko also predate on birds eggs in significant problem on the hill slopes of the eastern suburbs.

- *Action plan Goal One Objective 1.1 page 53* There is a need to recognise non-terrestrial sites including the Rivers and the Estuary as areas requiring the collection of existing biodiversity information. (Also for specific funding in order for that to occur.)
- *Objective 1.2 Conservation of Sites and objective 1.3 Control plant and Animal Pests Pages 54-55* There is a need to recognise non-terrestrial sites including the Rivers and the Estuary including its margins as requiring consideration under these objectives
- *Objective 1.4 page 56* The Trust would welcome the opportunity to work cooperatively with the City on this.
- *Objective 1.5 page 56* The Trust will actively support this objective.
- *Goal two Restoration of ecosystems pages 57-59* There is a need to recognise non-terrestrial sites including the rivers and the Estuary and its margins as requiring consideration under these objectives.
- *Goal Three Raised awareness and understanding pages60-61* There is a need to recognise non-terrestrial sites including the rivers and the Estuary and its margins as requiring consideration under these objectives.
- *Goal Four Participation pages 62-63* There is a need to recognise non-terrestrial sites including the rivers and the Estuary and its margins as requiring consideration under these objectives. The Trust would welcome the opportunity to work cooperatively with the City on this.
- *Goal Five Ongoing research and monitoring pages 64-65* There is a need to recognise non-terrestrial sites including the rivers and the Estuary and its margins as requiring consideration under these objectives.
- *Monitoring the Strategy and considering the alternatives pages 66-67* There is a need to recognise non-terrestrial sites including the rivers and the Estuary including its margins as requiring consideration under these objectives. The Trust considers that extending the Biodiversity Strategy to adequately include the Estuary and its rivers will require a substantial amount of funding
- *Proposed Budget pages 70-74* It is noted that the budget has been developed from the existing allocation with a separate wish list for additional funding should that become available. In keeping with the Whole of Council approach encouraged by the Local Government Act and advocated by this Trust we would like to see the Council Senior Management Team take the opportunity to consider whether some more strategic City-wide programmes - which will deliver no less benefits to biodiversity and hopefully considerably more - can be developed and funded.

As part of this more strategic approach the Trust would like to see a Whole of Council approach taken to protecting and enhancing the City's waterways including the Estuary.

It is noted that a five-year budget is proposed. Also required as part of the package are measurable targets and milestones for each programme and realistic monitoring and reporting to be built into the programmes to ensure the targets are met and the money allocated is being used most effectively.

Time and effort spent over the next six months to develop such a consistent and accountable framework to manage the biodiversity programme is likely to produce greater biodiversity benefits by the end of the review period.

On the subject of the specific allocations of funds proposed in the draft budget for the Estuary and the Rivers, the Trust is keen to get underway with the City discussions on the priorities and programmes which are set out in its Ihutai Plan.

There are a number of common programme areas of proposed activities where improved results and reduced overall costs might be delivered through a partnership approach. The Trust's production of the Ihutai Plan at a very low cost is illustrative that much can be achieved with modest means if a practical approach is taken.

The Trust wishes to acknowledge the very significant proposed allocations of funds in the proposed budget for the Estuary and its Rivers.

The Trust thanks the Councillors and staff for their excellent efforts to improve the Estuary and for their support of the Avon Heathcote Estuary Ihutai Trust.

Yours sincerely

Alex Drysdale  
**CHAIRMAN**

## Appendix A

### Ihutai Plan Targets for Goal 2

Target 7: Water quality in the Estuary and its rivers supports healthy aquatic ecosystems.

Target 8: The incidence of macro-algae as a nuisance in the Estuary is continuously reduced.

Target 9: The Estuary provides a healthy and safe ecosystem for birds.

Target 10: Estuarine fish populations are monitored and restored.

Target 11: Healthy estuarine invertebrate populations are restored and enhanced.

Target 12: Waste and contaminants entering the Estuary are continuously reduced.

Target 13: Protect, enhance and increase the natural areas of the Estuary and its catchments.