



Submission on Greater Christchurch Urban Development Strategy Options

3 June 2005

Avon Heathcote Estuary Ihutai Trust

Greater Christchurch Urban Development Strategy
Options document
C/- Christchurch City Council
P O Box 237
Christchurch

Organisation Making Submission:
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We wish to speak to the UDS Forum on our submission

Signed _____ Date: _____

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1. The Avon Heathcote Estuary Ihutai Trust thanks the UDS Forum for the opportunity to comment on the options set out in the document “*So many options... which will you choose?*”
2. It is the Trust's policy to be helpful and solution-oriented. We make this submission in good faith because we wish to help find a useful solution. We feel that it is vitally important that if Greater Christchurch is to develop it does not do so at the expense of its environment.

The Avon Heathcote Estuary Ihutai Trust

3. The Avon Heathcote Estuary Ihutai Trust (AHEIT, The Trust) is a charitable society registered in 2003. It was formed as a result of community requests over many years for the formation of an organisation that included committed representation from statutory bodies, tāngata whenua and other agencies.
4. The vision of the Trust is

Communities working together for
Clean Water
Open Space
Safe Recreation
and
Healthy Ecosystems
that we can all enjoy and respect

*Toi tū te taonga ā iwi
Toi tū te taonga ā Tāne
Toi tū te taonga ā Tangaroa
Toi tū te iwi*

5. The Trust has a special relationship with the Christchurch City Council and Environment Canterbury. The elements of this relationship are set out in a Memorandum of Understanding (MOU) which was signed in 2003 by the Chief Executives of the Councils and the Chairman of the Estuary Trust. Each Council also appoints a member to the Trust's Board.
6. The MOU reflects the new mode of councils working in partnerships with community groups that is envisaged by the new Local Government Act with its focus on Community outcomes.
7. As agreed in the MOU the Trust has developed the Ihutai Management Plan, with the final document being launched in September 2004. The implementation of the plan will be ongoing, and the Trust appreciates the partnership we have with the two Councils in the implementation process.

8. Further details about the Trust, its Constitution, the Memorandum of Understanding between the Councils and the Trust, the Trust's Management Plan, and its activities can be found on our website at www.estuary.org.nz
9. The Trust's Constitution (2002) includes in its objects the achievement of "...healthy working ecosystems for the Estuary and its catchments..." Further the Trust in its Management Plan (2004) states that references to the Estuary in the Plan should be read as encompassing the Estuary **and its catchments**.

The Options

10. In this submission we do not support any particular Option as presented. There is not enough information supplied in the document for us to understand what assessment has been undertaken on catchments and stormwater impacts.
11. The Trust is asking the UDS Forum to focus on the effects of development on the Avon and Heathcote catchments. The restoration of these rivers is dependent on obtaining changes to land and drainage management practices over the whole length of the river systems, and arresting their degradation.
12. Previous attempts at visions and catchment-wide plans for the river have been well intentioned and have achieved some environmental improvements. But they have not been successful in halting the flow of the most serious contaminants to the river. Also the springs and shallow groundwater seeps which provide much of the water for this river continue to be lost to land developments. To protect the aquatic qualities of the Avon and Heathcote Rivers will require an integrated approach to land use controls and storm water management that would guide the activities and practices of all units of the Councils.
13. It is gratifying that UDS Options document acknowledges that '*some forms of development can impose irreversible damage on the natural environment*', and that there are risks from development on our groundwater, and risks on developments from flooding. It is the current damage – some reversible, some irreversible - to the river systems, and ultimately the Avon Heathcote Estuary/Ihutai that is our concern.
14. But the focus in the UDS options document then seems to be in the infrastructural issues around water, with little consideration to an integrated catchment approach.

Integrated Catchment Management

15. Any planning for water needs to consider the total water cycle, and use integrated catchment management understanding and tools to assess the impact of development. Showing that there has been adequate modelling of the water systems for Greater Christchurch would give us more confidence in the assessment of any options developed.

16. Identifying flood plain areas on which there will be no development is a critical and urgent first step. Councils need to use a mix of statutory and voluntary mechanisms to retain these areas.

Land use

17. Clearly, land use activities in the Avon and Heathcote catchments impact greatly on the water quality and quantity in the groundwater and rivers, and on their ecological health. Small headwater and side streams are particularly easily damaged. Most of the contaminants that enter the rivers at various points along their course end up in the Estuary. These include silt from inadequately controlled earthworks, and organic compounds and heavy metals from untreated runoff from roads.

18. The UDS will need to enable controls on land uses that have negative impacts on the river systems.

19. Streams and water bodies also need wider and contiguous riparian margins which are well managed for ecological values

Stormwater

20. Current stormwater discharges are unsustainable, with major impacts in areas such as the Avon Heathcote Estuary/Ihutai, Halswell Floodplain, and Lyttelton Harbour basin – and their catchments. There appears to be little analysis of the stormwater impacts of the proposed options.

21. Cities world wide are becoming increasingly aware of the significant impact urban storm runoff has on natural water and aquatic ecosystems. It is time Greater Christchurch faced up to the issue of the poor quality of stormwater entering our waterways and ocean, and the contaminants that this stormwater carries.

22. Stormwater is damaging the ecosystems in streams, rivers, estuaries and harbours. On-site and neighbourhood scale retention and treatment of stormwater are required to reduce flows of current stormwater flow to minimise any damage.

23. Virtually the whole of urban Christchurch drains to the Avon Heathcote Estuary/Ihutai via the Avon and Heathcote Rivers and their numerous tributaries. Urban storm runoff contains heavy metals, hydrocarbons, suspended solids and bacteria. In the case of heavy metals, total amounts are higher than in oxidation pond discharges. BOD for 'first-flush' flows can be as high as raw-sewage.

24. Sediment carried in stormwater is the major contributor to loss of aquatic life in our urban waterways, especially in the upper Heathcote and its tributaries. It is time that sediment is recognised as a serious contaminant and that more effort is put into stopping the flow of sediment into the waterways.

25. Specifically we believe more effort should be put into:

- The prevention of sediment from earthworks from reaching the contributory drains and streams that flow into the river.
- The pretreatment of stormwater from roads to prevent toxic organic and inorganic chemicals reaching the waterway.
- Effective means of trapping toxic spills and other pollutants before they reach the river, and regular maintenance of these.
- Development of retention basins.
- The limiting of impervious surfaces to minimize peak flows
- Development of first flush retention basins for peak polluted flows.
- The development of retention basins so that flows are maintained and peak flood flows attenuated.
- The removal of silt from waterways and the reestablishment of gravel bottoms needed for fish spawning
- The enhancement of the river ecology including the native fishery and the re-establishment of mahinga kai.

26. Investment is required to improve the stormwater water quality both in existing areas as well as in greenfields subdivisions

Groundwater

27. Greater Christchurch is well known for its pure water supply. The quality of groundwater is a key indicator of sustainability. This water supply, both its quality and quantity, is not valued highly enough. The UDS needs to introduce mechanisms that put a high value on pure water, and identify different qualities of water for different uses.

28. Extraction of groundwater is already having an effect on the flows in spring fed streams and rivers. Limits must be set on groundwater extraction.

Ongoing dialogue with the UDS Forum

29. Following the current consultation we would appreciate ongoing dialogue with the UDS Forum so that our concerns and ideas can be taken into account for future work.

Commitment to Implementation

30. We also ask that the five councils continue their commitment to this UDS process right through to the development of statutory documents that will enable the principles and details of the UDS to be implemented. The Trust would be pleased to work with the UDS Forum in scoping and developing visions and action programmes for the river catchments and the Avon Heathcote Estuary/Ihutai.