



**Submission to
Christchurch City Council
Annual Plan 2006**

11 May 2005

Avon Heathcote Estuary Ihutai Trust

2006 Annual Plan Submissions
Christchurch City Council
P O Box 237
Christchurch

Organisation Making Submission:

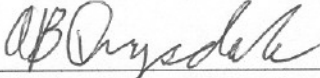
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We wish to talk to the main points of our submission at the hearings to be held between 7-10 June 2005.

(But acknowledging our limited availability as we will also be involved as a submitter to the CCC Resource Consent applications in the ocean pipeline which we understand begin in the same week)

Signed:  Date: 11-5-05
Alex Drysdale, Chairperson

1. Introduction

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.

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*

AHEIT prepared a draft Ihutai Management Plan (IMP) during 2003/2004 and following feedback and submissions from the community a final plan has been published.

Further details about the Trust, its Constitution, the Memorandum of Understanding between the Council and the Trust, the Trust's Management Plan, and its activities can be found on our website at www.estuary.org.nz

We note that the Council is also committed to improving the quality of the Avon-Heathcote Estuary environment, including:

- “Christchurch City Council is committed to removal of wastewater discharge from the Estuary where practicable
- Ongoing trials and studies to reduce and remove sea lettuce
- Improved stormwater quality discharged to rivers
- Removal from the Estuary of cut-off drain discharges at the ponds
- Improved discharge quality from the ponds in the interim by current pond modifications. This improvement will also be beneficial when the ocean outfall is operating. “ *(from CCC website)*

2. The Trust's special relationship with Christchurch City Council

The Trust has a special relationship with the Christchurch City Council. The elements of this relationship are set out in a Memorandum of Understanding (MOU) which was signed in 2003 by the Chief Executive of the Council and the Chairman of the Estuary Trust. The City Council also appoints a member to the Trust's Board. The full MOU can be read on the Trust's website at www.estuary.org.nz

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.

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 City Council in the implementation process.

3. Council Processes

We do understand that the 2006 Annual Plan is predominantly a communication to the community regarding changes to the 2005/06 budget as shown in the 2004/14 LTCCP. Our submission does not comment on any of these changes, but more importantly identifies changes in policy and direction that go beyond 2005/06.

In commenting on a few critical projects and decisions that the council will be involved in we are also signaling our wish to participate in these projects and issues from an early stage.

As recipients of many CCC 'consultation' documents we are very aware of the huge demand the uncoordinated consultation programme is putting on the community. As a voluntary organisation with extensive networks and an area of wide interest we observe the lack of integration among the Council units, resulting in duplication of effort both for council officers, and for residents and organisations who want to have a partnership with the Council as the LGA 2002 requires.

In our submission we comment and ask for action on:

- Integrated Environmental Management of the Heathcote River
- Stormwater
- The Green Edge
- Ocean Outfall budget

4. Integrated Environmental Management of the Heathcote River

The Trust's interests in the Heathcote River

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**. Clearly, land use activities in the Avon and Heathcote catchments impact greatly on the water quality and quantity in the rivers and 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.

The Trust considers that the Heathcote River is under considerably greater degradation pressures than the Avon. It is therefore focusing its efforts on arresting the decline of the Heathcote.

Recent and ongoing consultation on the Heathcote River

The Trust is aware of recent and ongoing consultation on the SW Area Plan, the SW Integrated Catchment Management Plan and the Heathcote River Vision. These plans seem to be instigated and lead by different units of the Council. To us there appears to be little integration across the plans, and certainly no clear vision for the whole river system.

Our submission

The Trust is asking that the Council focus on an integrated vision statement and implementation plan that will achieve the restoration of the aquatic values of the whole Heathcote River. This restoration is dependent on obtaining changes to land and drainage management practices over the whole length of the river system, and arresting the degradation. The Trust is supportive of local amenity works, provided the wider issue of protecting the aquatic values of the whole waterway is urgently addressed by the Council.

The development of a vision statement for the Heathcote River would require extensive consultation over the whole catchment and beyond. It would develop goals and policies, and methods to achieve those.

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. This limited effectiveness probably stems from the projects being based in individual units of the Council and not being binding on all units. To protect the aquatic qualities of the Heathcote River 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 Council.

The Council should develop a Community Outcome and work programme focused on the restoration of the Heathcote River, to be included in the 2006/16 LTCCP. In line with the philosophy of the Local Government Act 2002 the vision and implementation plan would be developed in partnership with the community. Project plans would be developed that included fairly tight timeframes and budgets for achieving changes to land use management practices and controls, and consequent improvements to the River.

Such an approach would spearhead an integrated catchment approach to environmental management, and would be a vanguard project towards a sustainable City and for partnership projects with the community.

The Trust would be pleased to work with the Council in scoping and developing such a vision and action programme

5. Stormwater

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

Virtually the whole of urban Christchurch drains to the Estuary 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.

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 be put into stopping the flow of sediment into the waterways.

Specifically we believe more effort should be out 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
- 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.

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

There are also stormwater pipes discharging directly to the ocean in North New Brighton and in Sumner. The positive effects of removing the wastewater discharge 3km off-shore will be negated at times, especially after heavy rainfall, because of the stormwater discharge to the beaches. The removal of these pipes should be planned to coincide with the wastewater pipeline completion.

Our submission

Immediate and ongoing comprehensive monitoring of stormwater discharges should be carried out so that a prioritisation of works to improve stormwater quality can be budgeted for in the 2006/16 LTCCP.

Removal of stormwater discharge directly to the ocean beaches by the time the ocean pipeline is operational

6. The Green Edge

The Trust is particularly concerned about the report that went Council on 17 March 2005, and the recommendations approved regarding increased costs for the wastewater pipeline and possible transfer of budge from the Green Edge project to the pipeline project.

We ask that the funding for this increase be provided from borrowing, and from rates, and that the \$9.28m budget for the Green Edge project not be reduced.

One concern about the 17 March report is the lack of proper assessment of the effects of reducing the Green Edge budget. The only effects assessed were financial, with no reference to the environmental, social or cultural effects of scrapping the Green Edge projects. We understand that the CW&W unit is suggesting an arbitrary total figure of \$500000, instead of the \$9.28m over three years as currently in the LTCCP. From what we can find out this \$500000 proposed is not the result of the analysis of work that needs to be done along the western Estuary edge.

Another concern is the apparent lack of understanding of the history and the objectives of the Green Edge project. There seem to be two misconceptions – first that the Green Edge project was created to go with the 2001 Resource consent application to continue wastewater discharge to the Estuary and secondly, that the only purpose of the Green Edge was to compensate for the continued wastewater discharge to the Estuary as applied for in the 2001 Resource Consent. Now the discharge is being removed from the Estuary it has been assumed this compensation is not required.

To correct these misconceptions:

Timing of the Green Edge project

- We are aware of Council documents on the Green Edge concept that date back to 1993 (*Waste Management Unit – Recreation and Development Opportunities –*

Drainage and Waste Management Unit Farm. There could well be earlier similar concepts under a different name

- The ideas were further developed in 1995 in various reports from NIWA (Paul Sagar, Tom Snelder), CCC Design Services (John Walter, Howard Simpson, Dennis Preston) and Fish and Game,
- and again in 1999 (*Studio 33 Landscape Architects – Ihutai Reserve; Woodward-Clyde, Estuary Green Edge - Te Ihutai (Final Report)*)
- In July 2001 a project team led by City Solutions produced a proposal for consultation entitled *Estuary Green Edge*. Consultation was deferred on this until 2002, and as far as we are aware no consultation proceeded.

The vision and objectives of the Green Edge Project (2001)

VISION

To create an attractive, ecologically healthy and sustainable margin to the western edge of the Estuary, that represents and enhances the outstanding natural, cultural and recreational values of the Estuary's area.

OBJECTIVES

- To integrate the landscape, ecology, recreation and heritage values within the western margin of the Estuary known as the 'Green Edge'
- To recognise the dynamic and biologically rich nature of the Estuary
- To maintain, nurture and celebrate what is valued around the Estuary
- To satisfy existing and potential recreation needs and users and provide for public enjoyment
- To provide sustainable, attractive and environmentally friendly systems for stormwater and wastewater treatment
- To manage existing farm operations and activities to the benefit of wildlife
- To create coastal habitats and associated plant communities with particular emphasis on expanding opportunities for wildlife
- To provide interpretation information and associated facilities for ecotourism and education
- To provide facilities and opportunities for research and the advancement of eco-technology studies
- To protect existing native plant communities and wildlife habitats

These objectives are far reaching and much broader than a single objective to compensate for wastewater discharging to the Estuary. In fact in October 2002 when the Council decision was made to apply for consent for direct discharge to the ocean a decision was made to continue to support the Green Edge project. (Council minutes Oct. and Dec. 2002)

Green Edge Budget

In 2000 the CCC wastewater consultation website stated:

“Work on the 'Green Edge' is scheduled to start in 2005, with the initial phases expected to be completed by 2007. This programme has been included in the Council's indicative capital works programme at a cost of \$14 million (apart from bridging and roadworks),

with ongoing maintenance costs estimated to be \$300,000. This will cost an additional \$11 on the average annual residential rates bill.”

By 2004 the total was reduced to \$9.26m:

Capital Outputs 2004/05 CW&W	
Description : Christchurch Wastewater Treatment Plant - Green Edge	
2004/2005	-
2005/2006	-
2006/2007	\$52,000
2007/2008	\$52,000
2008/2009	\$3,060,000
2009/2010	\$3,060,000
2010/2011	\$3,060,000
2011/2012	-

The budget line item for the Green Edge has been incorrectly retained in the CW&W budget even though the Green Edge project as developed in 1999 and 2001 was integrated across the City Environment units. Just because it has remained in their budget the CW&W unit should not see the Green Edge budget as a fund to access because of poor estimates and increasing costs across the construction industry.

CW&W are also assuming that because they are planning for the wastewater discharge to be piped directly to the ocean no further work is required for trialling and investigating alternative treatment systems such as decentralized treatment, constructed wetlands, typha beds etc. We would dispute this. In the last ten years of debate on the wastewater discharge the council has assured the community that there will be continual improvements of wastewater quality discharged (despite population increase and independent of the site of discharge).

Our submission

The Green Edge concepts included developments for the Bexley Reserve (an ex landfill site), the oxidation ponds, the Estuary edge, and the Linwood paddocks. Whether it is named the Green Edge or some other name, funding of the current \$9.28m - or more - is required to restore the western edge of the Estuary between the Heathcote and Avon Rivers including Bexley Reserve and the Linwood Paddocks. This is an area that has been neglected for many years, has been degraded because of sewage treatment, wastewater disposal, rubbish disposal, landfill and reclamation. Along much of this western edge the reclamation and fill is of material of dubious content. What once was a soft estuary shoreline has been replaced with hard edges, unnatural and often unsightly structures. (Photos will be provided at the hearing). In places these walls are eroding and it is very likely that toxic material is now contaminating the Estuary, and rubble is falling from the banks onto the Estuary floor. Removing this material will not be easy or cheap but needs to be done because of the current adverse effects on the Estuary habitat.

Many of the changes imposed on the Estuary and its adjacent land margins are largely irreversible. However there is great potential to restore and protect the remaining habitats, create new habitats, and emphasise the positive environmental attributes of some of the human induced changes (e.g. oxidation ponds).

There are also opportunities to demonstrate wastewater treatment using natural systems such as constructed wetlands or typha beds. This was part of the original Green Edge concept in must be retained as for a number of reasons the city can not continue to centralise all its wastewater treatment at one site.

Rather than reducing the budget for the Green Edge project the \$9.28m budget should be increased to recognise and compensate for the desecration of the Estuary and its margins area for the past 125 years. Removing the wastewater discharge from the Estuary provides an opportunity to improve the ecology along this coastal boundary.

If the Council does consider reducing the Green Edge budget then a comprehensive and separate special consultative process should take place before the 2006/16 LTCCP is published. The Trust should be considered as a major stakeholder in this process.

7. Ocean outfall construction

As has already been identified in the 17 March 2005 report to Council the estimate for the construction and installation of the ocean outfall has increased to \$77m.

Two broad construction methods have been proposed for the pipeline – an open trench method or a tunneling method. In our submissions on the Resource Consent we advocate that a tunneling method should be used, at least for the Estuary crossing. We are hopeful that the commissioners will make this a condition of the consent.

We would ask the Council to consider very carefully the adverse ecological consequences if an open trench method were used to lay the pipe across the Estuary. If a decision on the construction method comes before the Council we would ask that there be heavy weighting on the attributes of the methods proposed, and that financial costs are only considered if there is little difference in the environmental and social effects of the methods presented.

We are aware tunneling will be more expensive. Because of the likely higher cost we ask that the Council show this additional cost in their budgets in the 2006/16 LTCCP.

8. Summary of actions asked for in our submission

The Avon Heathcote Estuary Ihutai Trust asks that:

Heathcote River:

The Council focus on an integrated vision statement and implementation plan that will achieve the restoration of the aquatic values of the whole Heathcote River.

This restoration is dependent on obtaining changes to land and drainage management practices over the whole length of the river system, and arresting the degradation

The Council develop a Community Outcome and work programme focused on the restoration of the Heathcote River, to be included in the 2006/16 LTCCP.

In line with the philosophy of the Local Government Act 2002 the vision and implementation plan would be developed in partnership with the community.

Project plans be developed that included timeframes and budgets for achieving changes to land use management practices and controls, and consequent improvements to the River.

Stormwater:

Immediate and ongoing comprehensive monitoring of stormwater discharges be carried out so that a prioritisation of works to improve stormwater quality can be budgeted for in the 2006/16 LTCCP.

Removal of stormwater discharge directly to the ocean beaches by the time the ocean pipeline is operational

Green Edge project:

The Council recognise the broad values of the Green Edge project and that removing the wastewater discharge from the Estuary provides an opportunity to improve the ecology and amenity along the Estuary edge.

Rather than reducing the budget for the Green Edge project the \$9.28m budget be increased to recognise and compensate for the desecration of the Estuary and its margins for the past 125 years.

Ocean Outfall:

That in the 2006/16 LTCCP the budget for the Ocean Outfall be at a level that allows for a tunneling method of construction