

**SUBMISSION FROM  
THE NORTH CANTERBURY FISH AND GAME COUNCIL**

<b>SUBMITTER:</b>	North Canterbury Fish and Game Council 3 Horatio Street Christchurch
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**This submission is made in reference to the Christchurch City Council's *Draft Long Term Community Plan 2006 - 2016*.**

Fish and Game Councils are Statutory Bodies with Functions (*inter alia*) to:

*'manage, maintain, and enhance the sports fishery and game resource in the recreational interests of anglers and hunters ....*

*' to maintain and improve the sports fish and game resource by maintaining and improving access; ...*

*' In relation to planning, -*

*'To represent the interests and aspirations of anglers and hunters in the statutory process, ...and*

*'To advocate the interests of the Council, including its interests in habitats...'*

**Section 26Q, Conservation Act 1987**

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**The North Canterbury Fish & Game Council DOES wish to be heard in support of this submission.**

## **Introduction from the Mayor**

### **Support (p.6):**

"What I urge ratepayers to do when you consider this budget is think not just of yourself, but think of your community...How can we sustain our waterways and our wonderful tap water?"

#### *Reason:*

Fish & Game agree with this sentiment and suggest that the exclusion of any further funding or assistance to Central Plains Water would be a good start in this regard.

## **Council Vision**

### **Support (p.9):**

The emphasis on recreation, leisure and lifestyle options in the following 'Visions':

"A place where people enjoy living

The most attractive city in New Zealand

A 'must-see' for visitors to New Zealand."

#### *Reason:*

Recreational opportunities offered by rivers, streams and lakes in and around Christchurch are important not only to current citizens, but to future citizens and tourists based in Christchurch.

Christchurch is quite unique in that attractions such as the salmon fisheries of the Rakaia and the Waimakariri and the trout fisheries of the Hurunui and high country lakes, are all easily accessible for Christchurch residents.

Your Council perceives it has a role "to help ensure a healthy regional economy" (see p.27) – yet this draft Plan is silent on what role Council should take to ensure that the region continues to support other wellbeings (being social, cultural and environmental). Fish & Game suggest that the significant benefits to Christchurch and its residents gained from natural assets such as those noted above *does* justify Council involvement, at least from an advocacy perspective, in protecting the social, cultural and environmental wellbeing gained from the region's water resources.

### **Oppose (p.9):**

Lack of any explicit 'vision' on environmental and ecological matters.

#### *Reason:*

Robust, healthy ecosystems are required to support all four wellbeings (economic, social, cultural and environmental). Ecosystems are also affected by a broad range of activities undertaken by and responsibilities of your Council. It is therefore disappointing to read that the Council lacks a specific vision recognising the importance of healthy ecosystems and ensuring Council activities and responsibilities provide for them.

## **Our Environment Today**

### **Oppose (pp.36-38):**

No recognition of sportfish values within Council boundaries.

#### *Reason:*

The Waimakariri River denotes the northern boundary of your Council. This river is the most popular salmon angling and jetboating destination in New Zealand, and hosts nationally significant populations of endangered braided river birds. The Waimakariri River's ecological and recreational values deserve specific recognition in this section.

Valued trout fisheries also exist within Council boundaries, including the Styx River, Otukaikino River, Avon River and Heathcote River.

As noted earlier in this submission, it may be appropriate to recognise rivers and lakes outside of Council boundaries within short (2 hour) driving distance of Christchurch City. This would include the Rangitata River, Rakaia River, high country lakes, the Hurunui River and the Clarence River.

## **Community Outcomes**

### **Support (p.44-46):**

The emphasis on recreation and environment in the following 'Community Outcomes':

- A City of People Who Value and Protect the Natural Environment
- A Healthy City
- A City for Recreation, Fun and Activity

#### *Reason:*

Gives suitable recognition to the importance of recreation and a healthy environment to all four wellbeings of Christchurch citizens.

## **Strategic Direction – Strong Community**

### **Support (pp.49-51):**

The following passages from this section which emphasise the importance of environmental and recreational amenity values:

"Supporting economic development that meets the needs of the city's people and environment."

"Maintaining and improving environmental health"

"Providing a variety of safe, accessible and welcoming...waterways."

## **Strategic Direction – Healthy Environment**

### **Support (p.51):**

The adoption and ongoing application of the 'Natural Step' philosophy to Council activities and responsibilities.

*Reason:*

Adoption of the Natural Step philosophy suggests that Council will work within sustainable environmental limits in achieving a 'sustainable society'. This has economic as well as social, cultural and environmental benefits.

**Support with amendment (p.52):**

Goals and Objectives.

*Amendment sought:*

Add the following objective for Goal 6:

"- Protect the habitat of trout and salmon."

*Reason:*

Presently the goal mentions both native and exotic ecosystems, but there is no matching objective providing for valued exotic species. The suggested objective is consistent with section 7(h) of the Resource Management Act and may better promote achievement of the goal.

**Support with amendment (pp.52-53):**

Key Challenges.

*Amendment sought:*

Reword the following key challenge (i.e. delete strikethrough text):

"Protection of natural resources from over-use and pollution.  
Water resources ~~in aquifers~~, open space, the air that we breathe and other natural resources, need to be protected from over-use and pollution."

*Reason:*

Surface water resources in Christchurch and the Canterbury region are under huge pressure from over-abstraction. It is not appropriate to restrict the scope of this key challenge to only groundwater.

**Support with amendment (p.53):**

Who we work with.

*Amendment sought:*

Reword the following sentence (i.e. include underlined text and delete strikethrough text):

"The Council will work with Government departments and statutory agencies such as the Ministry for the Environment ~~and the~~, Department of Conservation and Fish & Game, to understand...

*Reason:*

The Conservation Act established Fish & Game as the statutory manager of sportsfish, gamebirds and their habitat and as the official representative for the interests of anglers and hunters. As a Crown entity, Fish & Game should not be regarded as a 'conservation or recreation organisation' or lobby group, but rather an organisation of equal status to the Department of Conservation (who are included in this section).

### **Strategic Direction – Prosperous Economy**

#### **Support (p.57):**

Key challenge:

"Ensuring that development is environmentally sustainable."

#### *Reason:*

This approach should ensure achievement of non-economic wellbeings should not be jeopardised by striving for economic benefits.

### **Capital Works Programme**

#### **Support (general):**

Exclusion of any provision of funding or assistance for the Central Plains Water proposal.

#### *Reason:*

The proposal is fundamentally flawed and poses significant risks to the benefits currently gained by Christchurch residents from water resources between and including the Waimakariri River and Rakaia River. For these reasons it is entirely appropriate for Council to not contribute any further to this proposal.

### **Capital Works Programme – Discretionary Projects / Non priority**

#### **Oppose (p.74):**

The exclusion of 'Water Re-use', 'Avon-Heathcote Estuary Ihutai Trust Development' and 'Cashmere Stream' from the list of priority projects.

#### *Reason:*

The former two projects could provide substantial future benefits to Christchurch residents through protection of our valuable drinking water supplies and enhancement of a nationally significant estuarine environment.

If Councillors are in any doubt about the need to enhance Cashmere Stream, Fish & Game suggest they make a visit to the area and witness its degraded state. This stream formerly supported brown trout and salmon spawning, as well as significant native fish values. Stormwater discharges have significantly degraded those values although the potential for restoration still exists. Fish & Game strongly support the inclusion of this project as a priority in this Plan.

### **Council Activities and Services – City Development**

#### **Support (pp.93-95):**

The inclusion of the following passage under “What policies, strategies or drivers support these objectives”

“Environmental sustainability”

### **Council Activities and Services – Economic Development**

#### **Oppose (pp.114-119):**

Exclusion of environmental sustainability under “What policies, strategies or drivers support these objectives”.

#### *Relief sought:*

Add “Environmental sustainability” to this part of the Plan.

#### *Reason:*

The potential negative effect of economic development on the environment is acknowledged on p.119. Like all Council activities, economic development should occur within environmental bottom-lines whilst balancing all four well-beings. A balanced approach to economic development must therefore be driven by (among other things) environmental sustainability.

### **Council Activities and Services – Parks, Open Spaces and Waterways**

#### **Oppose (p.123):**

No measures or targets are included relating to aquatic ecosystem health or water quality.

#### *Relief sought:*

Include appropriate measures / targets as above; suggested wording as follows:

“% of waterways with fair or better ecosystem health.”

“% of waterways suitable for contact recreation.”

#### *Reason:*

At present the only proposed measure / target is “Residents satisfaction with the appearance of waterways and wetlands.” While aesthetic values are important, Fish & Game submit that Council should set measures and targets intended to provide for a broader range of benefits, including environmental and recreational benefits.

### **Council Activities and Services – Recreation and Leisure**

#### **Oppose (p.128-133):**

The recreational benefits obtained from waterways such as the Waimakariri, Avon and Heathcote Rivers is not acknowledged in this part of the Plan.

*Relief sought:*

Include aforementioned rivers as 'key assets' for recreation and leisure.

*Reason:*

The Waimakariri River is the most popular salmon fishing river in New Zealand (and in fact, the Southern Hemisphere). It is also the most used river by jetboaters, and is heavily used by whitebaiters, sailors, swimmers, walkers etc.

Annual events are also held by Council on the Avon and Heathcote Rivers.

It is therefore appropriate that these rivers be considered 'key assets' for recreation and leisure.

**Council Activities and Programmes – Stormwater**

**Oppose (p.216):**

The inclusion of the following sentence:

"Ecosystems in the majority of streams are in a degraded condition, however the impact on waterway habitats appears to be accepted by the majority of the community and a rigorous debate on the community costs and benefits of markedly improving environmental outcomes is required."

*Relief sought:*

Delete aforementioned sentence.

*Reason:*

Fish & Game are unaware of any consensus arrived at by the community that degraded ecosystems are 'acceptable'.

The Council has obligations under section 5 of the Resource Management Act to promote sustainable management, including safeguarding the life supporting capacity of the environment. The community do not have the discretion to waive this responsibility even if they wished to do so.

**Council Controlled Organisations – Central Plains Water Trust**

**Oppose (p.235):**

Any continued funding or support for Central Plains Water Trust or related organisations.

*Reason:*

Fish & Game has previously expressed its concern about the impacts of this proposed scheme on water quantity and water quality and associated recreational and environmental values. Fish & Game wishes to make it clear that our position in respect of this proposal has not changed, and therefore, that we oppose any further funding of CPW by your Council.