

5. SUBMISSION TO THE DRAFT NATURAL RESOURCES REGIONAL PLAN

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The purpose of this report is to advise the Committee of a draft submission prepared on Environment Canterbury's Draft Natural Resources Regional Plan, Chapters 4,5,6,7 and 9 and to gain support for this submission. This report will also be presented to the Sustainable Transport and Utilities and Regulatory and Consents Committees.

INTRODUCTION

Late last year, Environment Canterbury released five chapters of its Draft Natural Resources Regional Plan for informal comment. This includes the chapters Soil Conservation (Ch4), Water Quantity (Ch5), Impacts of Afforestation on Water (Ch6), Water Quality (Ch7) and Wetlands (Ch9). The remaining chapters, Chapters 1-3 and Chapter 8 are being released for comment separately.

The Council began developing its submission to the Plan in December 2001. Extensive consultation on the Plan has taken place with Community Boards, Elected Members and staff over the past two months, to increase understanding about what Environment Canterbury is proposing for the soil and water resources of the region, and to discuss the major implications of the Plan for Christchurch City. Feedback obtained from this consultation has helped develop the submission (attached). Submissions close on 29 March 2002.

KEY ISSUES AND IMPLICATIONS

The Natural Resources Regional Plan is relevant to the Council as a landowner, shareholder, infrastructure provider, and as administrator of the Proposed City Plan. As a regional plan dealing with the region's most significant natural resources, it has important implications for the Council and Christchurch generally.

Below is a summary of each chapter and the key issues each raises. This is by no means a complete overview of the issues, due to their complexity and the wide scope of the Plan. For greater detail refer to the submission attached.

Soil Conservation

The soil conservation chapter addresses the issues of loss of the life-supporting capacity of soils and widespread soil contamination. Through various policies, the chapter seeks to:

- Reduce the risk of induced erosion or soil quality;
- Maintain an intact and resilient vegetation cover over all non-arable land;
- Restore nutrient levels by balancing inputs and outputs;
- Reduce erosion rates for arable soils in line with set targets;
- Stabilise land subject to gully, tunnel gully or mass movement forms of erosion; and
- Reduce the rate of cadmium accumulation in the soil.

Overall, this chapter provides a positive general direction and approach to appropriately managing the regions soil resources. The key issue this chapter raises is the potential impact that extensive erosion control planting may have on the significant landscape character of the Port Hills. While the benefits of tree planting to curb erosion are recognised, care must be taken to ensure that these values are not compromised.

Water Quantity

The region's water resources are used for a wide range of purposes including recreation, as a source of food, irrigation, industry and community and stock water supplies. Managing the competition for water between these different demands is the primary focus of the water quantity chapter. The chapter deals with two key water management topics:

- Setting the flow and/or level regimes for the management of rivers, lakes and groundwater to protect instream/intrinsic values
- The allocation of water above any set flow or level regime to out of stream/consumptive uses, and its efficient use.

This chapter makes some progress in addressing issues such as the protection of natural flows and lake levels, protection of in-stream and intrinsic values, maintenance of groundwater levels and the efficient use of water. However, a number of issues emerge that will have significant implications for the Council and Christchurch generally.

For instance, water allocation limits would be chosen so that restrictions may be required (including total hosing bans) one year in five. This may involve a significant environmental cost in terms of the quality of public and private gardens and open space that Christchurch residents would not wish to see repeated often. Another concern is that some wells in the Christchurch urban supply system would be limited to 250 litres per person per day during restrictions. This could have significant implications for large industrial users and irrigation, and appears to be an arbitrary figure bearing little resemblance to actual likely demand.

Water Quality

This chapter sets out Environment Canterbury's approach to addressing water quality issues in the region. It deals with three main water management topics including:

1. Setting water quality outcomes for Canterbury's rivers and lakes and the management of point source and non-point source discharges.
2. Setting water quality outcomes for the confined and unconfined aquifers and the management of discharges to land and groundwater; and
3. Safeguarding the quality of community drinking water sources.

The chapter makes a considered effort to improve water quality in our rivers and protect our community water supply catchments. Some of the methods identified in the Plan to address these issues, are however of concern to the Council.

For instance, a substantial increase in the number of resource consents will be required by the Council eg for all new sewer pipelines, and consents to use water (in addition to the consents to take) and consents for all stormwater discharges in community drinking water supply zones. This will have significant cost implications for the City.

The Plan also allows for a deterioration of the current high water quality of the first aquifer, to the maximum acceptable values indicated in the drinking water standards. This is the aquifer where Christchurch obtains approximately one third of its public water supply and it is questionable whether Christchurch residents would be supportive of deterioration to the standards allowed by this chapter.

Also, within the Christchurch/West Melton Aquifer Recharge area, the plan restricts hazardous substances storage facilities, intensification of land uses, and new activities that involve contaminants that pose a significant risk to groundwater quality. These restrictions would effectively prohibit urban growth west of Stanmore Road.

Impacts of Afforestation on Water Yield

This chapter addresses the issue of the risk of a reduction of water flows arising from the establishment of plantation forestry within forestry sensitive catchments. The chapter therefore seeks to control catchment planting in such areas to avoid the adverse effects on minimum flows, in-stream values and existing extractive uses. A key concern with the direction of this chapter is that it creates a tension between reducing forestry in some catchments to reduce the impacts on water yield and the traditionally viewed benefits of afforestation, including addressing issues like erosion, carbon emissions and loss of biodiversity.

Wetlands

The wetlands chapter has developed a number of policies and methods for protecting, enhancing and re-creating wetlands in the region. It contains policies and methods that aim to maintain the gross area of wetlands, improve their ecological integrity and functioning, improve access and increase the range and diversity in under-represented areas. It allows wetland restorations to be carried out without the need for resource consent and promotes greater education of wetland values and wetland management practices. However, it also makes minor wetland drainage a permitted activity and relies entirely on voluntary methods of wetland protection to maintain the gross area of wetlands we currently enjoy. Giving effect to many of the policies within the chapter relies largely on the use of a wetlands inventory which, while started, is not likely to be completed for another three years.

FUTURE PROCESS

Environment Canterbury has indicated that the Plan will be formally notified as a Proposed Plan in July 2002. At this time, a formal submission process will begin and the Council will again have an opportunity to make comment. Once notified as a Proposed Plan it will have statutory effect and the City Plan must not be inconsistent with it on matters of regional significance.

It is proposed that staff from both the City and Regional Councils continue to work together to develop further the issues of mutual interest contained within this Plan until the Plan is notified. Similarly, it is suggested that Elected Members initiate a Joint Councillor working party with Environment Canterbury for ongoing liaison during the plan development process. A working party has recently been established within the City Council to liaise with Environment Canterbury on issues relating to the Natural Resources Regional Plan.

- Recommendation:**
1. That the Committee support the submission to Environment Canterbury.
 2. That a joint Councillor working party be initiated between Christchurch City Council and Environment Canterbury elected members to liaise on the issue of mutual concern raised in the plan.

Chairman's

Recommendation: That the above recommendation be adopted.