

**SUBMISSION of LYTTELTON HARBOUR ISSUES GROUP
to
CHRISTCHURCH CITY COUNCIL'S DRAFT LTCCP 2009-19**

The Lyttelton Harbour Issues Group wishes to discuss the main points of this written submission at the forthcoming hearing.

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Background on Lyttelton Harbour Issues Group

The Lyttelton Harbour Issues Group (LHIG) is comprised of members of the different communities and Landcare groups¹ in Lyttelton Harbour basin and is supported by representatives of:

- Christchurch City Council (1x staff, Councillor, and Community Board representative),
- Environment Canterbury (1x staff, and Councillor),
- Rapaki Runanga,
- Department of Conservation,
- Community and Public Health, and
- Lyttelton Port of Christchurch.

The LHIG, together with the Akaroa Harbour Issues Working Party, was established 10 years ago in January 1999, as a result of concern for largely environmental issues in each of the Lyttelton and Akaroa Harbours. The Groups were established to provide wider distribution of information relating to district and regional council activities and achieve a greater level of local input to district and regional council policies and operating. Over the subsequent decade the groups have established an effective forum for encouraging co-operation between the communities and authorities to find solutions to common problems

A key focus of the LHIG has been the harbour's water quality as this is affected by many land and water based activities. In its first 5 years LHIG assisted in establishing ECan's SWIM programme. This work, using volunteers from LHIG to collect weekly sea water samples, provided the model adopted subsequently for other coastal communities and has continued over the entire 10 year period, along with providing advice on contamination causes. Programmes for monitoring water quality for shell fish gathering and follow up on other water quality issues eg algal blooms are established activities. The LHIG is

¹ Lyttelton, Corsair Bay, Cass Bay, Rapaki, Governors Bay, Sandy Bay, Charteris Bay, Church Bay, Diamond Harbour, Purau

represented on the Lyttelton Harbour Joint Waste-Water Working Party - having determined to concentrate on its other key harbour concerns given its limited resources.

The change in the harbour's sediment and marine biota, and harbour infilling is another aspect of water quality of key concern to LHIG members. A key initial focus has been on land derived sediment entering the harbour – from changes in land-use practices, subdivision practices, collection and disposal of road run-off resulting in land failures, discharge to streams etc. However, concern also exists with changes to the harbour resulting from both natural and non-natural causes – including the management of the port. While these concerns were largely derived from members' observations and experiences, from oral history, and the application of knowledge from research undertaken elsewhere, they have been now substantiated by independent research - in reports sought by the LHIG. These reports include:

- Hart, D.E., 2004. Sedimentation in the Upper Lyttelton Harbour. Report to ECan.
- Goff, J. 2005. Preliminary Core Study – Upper Lyttelton Harbour. Report to Ecan. NIWA.
- De Vries W.J. 2007. Mudflat Morphodynamics and sedimentation rates: a casestudy of the intertidal mudflats at the Head of the Bay, Lyttelton Harbour. Honours Dissertation (Geography) University of Canterbury.
- Ecan, April 2008. *Lyttelton Harbour potential contaminant sources study, 2007*. Report No. U09/17
- Hart D.E. et al, June 2008. *Mapping of the Bathymetry, Soft Sediments, and Biota of the Seabed of the Upper Lyttelton Harbour*. University of Canterbury Estuarine Research Report 36/Ecan Report 08/35

Copies of these reports are publicly available and have been issued to representatives of CCC on the LHIG.

Submission of the LHIG

The LHIG's interest is in the whole Lyttelton Harbour environment and the complex inter-relationships of its different components – irrespective of administrative jurisdiction and as evidenced with the commitments and support of the various agencies. The LHIG community members are generally concerned that the current LTCCP is *light* in its concern for the “environmental well-being” of the district – particularly as compared with the economic and social “well-being” of the city. The LHIG therefore requests greater attention to the environment and our living within our resource base, and to the environmental impacts of developments, management and maintenance programmes. Some specific areas to be better addressed include:

1.. Subdivision

The LHIG has monitored the implementation of a number of recent subdivisions in the Lyttelton Harbour. It is concerned with the environmental outcomes resulting either from conditions of approval set in non-notified applications or during construction and the lack of compliance with best practice and approvals (sometimes resulting from inadequate monitoring). Improvements are therefore requested, including resources and training if

these are the internal Council issues, to ensure negative environmental effects are nonexistent (or negligible).

2. Stormwater from roading

The LHIG supports the very recent initiative for road storm-water as a result of road widening and other upgrades to be reticulated to a sound discharge point on rural and reserve land - therefore minimising ongoing land failures from water “dumping” at the edge of road reserves (and resulting in subsequent road undermining, tunnel gullying, and collapse of some down hill facilities eg tracks). Adequate provision for sound discharge of road storm-water should be costed in to all future road improvements works. To date structural solutions have been provided and some further consideration could be given to integrating some vegetation for aesthetic, habitat and where/if appropriate stock shelter values.

3. Coastal edge

Lyttelton Harbour, as with other parts of Banks Peninsula, contributes to the length of coastline within the district. This land-sea interface has not always been valued ecologically over the decades and has instead been the location of rubbish dumps (and pest infestations), waste storage and reclamations, leading to the depletion of natural habitat and areas of high biodiversity. The LHIG promotes the importance of the coastal land-water interface as being important for habitat recovery as well as, where practicable and compatible, for access enjoyment. With predicted changes in sea level this area is likely to be impacted and therefore future provisions anticipated. The Head of the Bay has been identified as the “best and most extensive saltmarsh vegetation in the (*Ecological*) District and Region and is of high conservation value”. Despite its obvious modifications, it is identified as a Recommended Area for Protection or RAP (Hugh Wilson and DOC) and Area of Significant Natural Value under the Regional Coastal Plan and is worthy of rehabilitation.

4. Waste-water discharges to sea

The LHIG anticipates and aims to work toward the harbour’s return to improved marine biodiversity and therefore does not support the current levels of discharge and overflows of sewage and waste-water to the harbour waters. It recognises the current CCC has inherited a situation of substandard infrastructure from the former BPDC and that progress is being made to improve the systems. However, the LHIG promotes the need to ensure future growth within the harbour is compatible with highest standards and the environment’s capacity to absorb it. The flushing of the harbour is understood to take 6 -7 days and, in the event of an overflow many communities may be affected either directly or indirectly within this time frame. The LHIG promotes the need to ensure the highest standards of harbour water quality – for food take, contact recreation, aesthetic and tourism values.

5. Multi-value management of Road Reserves

The LHIG supports the Community Board’s proposal to manage and better rationalise road reserves for their multiple values, including vegetation and habitat values, stormwater, and various forms of recreation. It recognises that many unformed legal

roads exist in addition to the formed roads and that careful planning and management is required to meet immediate needs while ensuring good outcomes for the future.

With its proximity to Christchurch, Lyttelton Harbour is already experiencing pressure on its existing formed road and track networks - for cycling and walking as well as for increased vehicular recreation, touring/sightseeing, and increases in use by an expanding resident population. With its particular geography and ecology, it is important that a comprehensive plan is undertaken which also encompasses the other values and linkages. It is noted a Landscape Protection Programme for Lyttelton Harbour/Whakaraupo was approved in the Greater Christchurch Development Strategy (p87) for timing in 2009. Provided this is properly resourced this could provide an appropriate vehicle for undertaking a well integrated approach to the various issues.

6. Coastal track

The LHIG supports the proposal to link existing coastal tracks and walkways into a continuous network as close as possible to sea level (and with linkages to other walkways). This will provide greater access and enjoyment of the harbour's water as a key attraction. It is a missing link in the current provision of tracks given the access to and location of existing settlements, and the current and predicted demographics of the resident and visitor populations.

7. Lyttelton Port of Christchurch.

The LHIG promotes the need for the LPC to take greater responsibility for its activities on the wider Lyttelton Harbour coastal environment. In the last 4 - 5 decades the LPC has had a strong mandate to meet economic goals but has undertaken (or been required to undertake) little investigation of its impacts on the wider harbour. For example, the last hydrographic survey of the upper harbour was undertaken in the 1950s although regular updates have been maintained for the lower harbour. At a time of increased awareness of environmental and coastal processes, significance of diminishing ecological indigenous diversity, and recognised harbour infilling, this is no longer acceptable. [If the environmental grounds for comprehensively assessing these impacts are not considered to be sufficient then the effects on the district's recreation and tourism should be factored in!]

Some major projects are proposed for the port's development and operational changes within the term of the current LTCCP (eg channel dredging, reclamations etc) and adequate funding needs to be allocated to assess and minimise their environmental effects.

8. Continued support for LHIG as community partner

In the 10 years to date and as approved in the 2006 -16 LTCCP, the CCC (and formerly BPDC) has provided service support (shared with ECan) to the LHIG. It is requested this continue.