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Submission on 2009/19 LTCCP 8 April 2009

Avon Heathcote Estuary Ihutai Trust

Email to: ccc-plan@ccc.govt.nz

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We wish to speak to our submission. We ask that the officer comments on our submission be emailed to us at least two working days prior to our attendance at the hearing.

Summary of Submissions

We respectfully request that in the 2009/19 LTCCP that the Council:

1. Provide budget sufficient to continuing the Healthy Estuary Healthy Rivers monitoring programme until such time as nationally recognised water quality standards have been reached.
2. Include budget provision for the three fish surveys of the Avon Heathcote Estuary to be carried out post commissioning of the ocean outfall as required by resource consent conditions.
3. Includes sufficient budget provision to carry out the Green Edge projects as listed in clause 4.3 of this submission.
4. That the description of the line item in the LTCCP relating to the replacement of the Sumner causeway culvert be broadened to allow for expenditure on other related works and investigations that may need to be examined and undertaken.
5. Include provision for cycleway and pedestrian improvements in any planning/ investigative work for structural or design improvements to the causeway.
6. Include budget provision for road re-alignment to the eastern intersection of McCormacks Bay Road.
7. Provide budget to allow for the relocation of non-water sports groups at Scott Park to areas close by.
8. Provide budget to create pedestrian and cycle access on the Tunnel Road Bridge.

The Avon Heathcote Estuary Ihutai Trust

The Avon Heathcote Estuary Ihutai Trust thanks the Council for the opportunity to comment on this LTCCP. It is the Trust's policy to be helpful and solution-oriented.

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*

- a) 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.
- b) As agreed in the MOU the Trust has developed the Ihutai Management Plan. The implementation of the plan will be ongoing, and the Trust appreciates the partnership we have with the two Councils in the implementation process.
- c) 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 web-site at www.estuary.org.nz
- d) 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**.

2) Community Outcomes

Please see Appendix one for our comments on community outcomes

3) Ihutai Implementation Group

- a) The Ihutai Implementation group has met during the past year and is largely working as it should with projects in the Ihutai Management Plan being progressed as could reasonably be expected. We wish to thank the Council for the time and resources they have directed to the needs of Ihutai over the past three years. We are particularly pleased with the progress that has been made in terms of the work being done on the following issues:
 - Reclamations and ownership issues around the Estuary
 - Water quality monitoring of the Estuary and the rivers
 - Monitoring and publication of sewage overflow sites
 - Monitoring work done on sea lettuce prior to the removal of the outfall
 - The fish surveys which have been carried prior to the pipeline commissioning

Much has been achieved with the good will and cooperation of all parties; much is still to be done. In terms of the capital expenditure that will be required to complete work we believe is necessary over the life of this coming LTCCP we submit the following items. These requests, where relevant, have been aligned to goals in the Ihutai Management Plan:

4) Submissions on Capital Projects

Ihutai Management Plan - Goal 2: Healthy Ecosystems Are Sustained in the Estuary and its Surroundings

Target 1: Water Quality in the Estuary and its Rivers Supports Healthy Aquatic Ecosystems.

4.1 Healthy Estuary, Healthy Rivers Monitoring Programme

It is of great importance to the Trust that the Healthy Estuary, Healthy Rivers' monitoring programme is continued for the life of this LTCCP. We are very appreciative of the resources that both CCC and ECan have put in to develop this comprehensive monitoring programme over recent years and submit that continued monitoring is essential if the city wishes to understand exactly the nature and the sources of water pollution in the our city's rivers and Estuary..

Submission

Provide budget sufficient to continuing the Healthy Estuary Healthy Rivers monitoring programme until such time as nationally recognised water quality standards have been reached.

4.2 Post Commissioning Ocean Outfall - Fish Surveys

Ihutai Management Plan - Goal 2, Target 5, Action 1 - Estuarine fish populations are monitored and restored.

We are appreciative and thank the Council for the resources put into the three pre-pipeline surveys which have been carried out to determine the current nature and size of the fish populations of the Estuary. It is critical however that money is retained on budget for the 3 post discharge surveys to be done. If these post discharge surveys are not carried out or if their results are not analysed, a very significant piece of local research will be lost. We strongly recommend that this project is included in the Council's 2009/19 LTCCP and would remind Council that there is a legal obligation to carry out these surveys as an agreed condition of the discharge resource consent.

The condition in ECan Resource Consent CRC 012011

DECISION OF COMMISSIONERS APPOINTED BY THE CANTERBURY REGIONAL COUNCIL TO HEAR AND DETERMINE AN APPLICATION FOR A RESOURCE CONSENT TO CHANGE CONDITIONS OF CONSENT DATED 15 SEPTEMBER 2006

Fish survey

The consent holder shall commission five further fish surveys in the Avon-Heathcote Estuary, to be carried out generally in accordance with the methodology contained in G D James' 2006 report, Assessment of fish populations in the Avon-Heathcote Estuary (2005, NIWA client Report CHC2006-031) as follows:

- (a) two fish surveys in the period prior to the removal of the wastewater discharges from the Avon-Heathcote Estuary; and***
- (b) three fish surveys post commissioning of the outfall.***

(c) As part of all five surveys, an appropriate cohort of the fish, proportionally representing the range of species and age ranges caught, will be examined for size, age (if possible) and condition including the noting of chronic histopathological effects such as gill lesions.

(d) The sampling shall be undertaken generally at the same time each year.

(e) The report shall be made available to the Canterbury Regional Council and (in respect of the surveys prior to removal of the discharges) to the Discharge Audit Group, within six weeks of the completion of the survey in question.

Submission

Ensure the LTCCP contains budget provision for the three fish surveys to be carried out post commissioning of the ocean outfall as required by resource consent conditions.

4.3 Green Edge Project

Ihutai Management Plan - Goal 3: Wise Management of Open Space

The Green Edge concept dates back to 1993. In July 2001 a project team led by City Solutions produced a proposal for consultation entitled Estuary Green Edge.

Green Edge 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 recognize 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 eco-tourism 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 remain applicable.

The specifics of the Green Edge project which we would like to have incorporated into this LTCCP are:

- a. Develop a policy to allow access along the western edge of the Estuary between the wastewater treatment ponds and the Estuary. There is a strong community desire for walking access along this route. This will require agreement from the park rangers, City Water and Waste.
- b. There have also been requests from the community to provide a safe access from Dyers Road/Bridge Street roundabout through to Ferrymead. The Green Edge plan should make allowances for this access to take cyclist from Dyers Road which is a State Highway.
- c. Screen planting along the existing pathway to enable future public access while ensuring minimal disturbance to wildlife.
- d. Road stopping to be carried out around the perimeter of the Estuary where appropriate to enable improved managed public access, the protection of wildlife and to minimise intrusions.
- e. Humphries Drive - sea wall reconstruction and the provision of public access.
- f. Protect estuarine wildlife and landscape values of Linwood Paddocks from inappropriate development (by classification and habitat improvement). This would also support the continued operation of the wastewater treatment plant as it would provide a buffer between living areas and the treatment plant and the settling ponds.

Submission

Include budget provision to carry out the Green Edge projects as listed in clause 4.3 of this submission.

4.4 McCormacks Bay Culvert Replacement and Related Investigations and Works.

Ihutai Management Plan - Goal 4: Safe and Balanced Recreation

The draft LTCCP has a budget line for replacing the central culvert referred to as **WBS 542/001312**, "Causeway culvert and walls". \$502,020 is allocated for the period 2009-2011.

The Trust seeks the following:

That the description of the line item be broadened to allow expenditure on other related works and investigations that may need to be examined and undertaken.

Explanation

The McCormacks Bay Steering Group was established in 2006 with the strong public endorsement of the Chief Executive and the General Manager City Environment. The project framework was established as a model joint Community and CCC project as envisaged by the Local Government Act.

The steering group's mission statement is to ensure that an integrated planning and design approach is taken that takes into account the wider environmental and social issues in determining the optimum design and ongoing operating solutions for replacement of the causeway culverts. The Steering Group is tasked with producing a report to the Council on agreed proposals for implementation.

The steering group would be unable to fulfil its mandate or produce its report if the funding allocation is now to be limited to investigations and works directly tied to replacing only the centre culvert. There are still considerable hydrological and ecological factors to be evaluated before the steering group will be able to recommend with confidence the best hydraulic and environmental configurations for culvert replacement. New factors of increased flood risk for properties and loss of velocity for kayaking were presented to the steering group last month. These are yet to be evaluated. It is possible that improvements to all three culverts may be needed and a number of other engineering works.

It is imperative that the works that are applied for in the resource consent are adequately investigated so there is confidence that they will operate in the manner envisaged, will not give rise to unpredicted adverse effects and will also deliver improvements to the very degraded Bay.

The steering group at its last meeting agreed that Councillors should be advised through the LTCCP process of the need for the financial allocation to be broadened.

The Trust notes and supports the more comprehensive submission on this issue of Dr Kevin O'Conner.

The Trust further notes that while the \$502,000 provision may be sufficient for the main culvert replacement it is unlikely to be sufficient to cover the wider scope of investigations or works that the steering group is mandated to investigate and to recommend to Council on.

Submission

That the description of the line item be broadened to allow expenditure on other related works and investigations that may need to be examined and undertaken.

4.5 McCormacks Bay Causeway Provision for Walking and Cycling

Ihutai Management Plan - Goal 4: Safe and Balanced Recreation

We note that under this LTCCP the council has "budgeted \$68 million to promote active travel where the council encourages walking or cycling by making it easier and more pleasant for people to choose alternative transport methods and help reduce the pressure on our roads" page 30 of the LTCCP.

We would submit that at the earliest stage of considering any reconstruction work on the causeway that provision for walking and cycling be incorporated into any design planning. The causeway is a vital link of metropolitan significance in terms of a city to Sumner walking/cycling route. The popularity of Sumner as a destination for the public of Christchurch, in the summer months particularly, is well documented. The congestion such popularity brings to the suburbs east of the Ferrymead Bridge is enormous and planning for alternative transport methods into this route must begin with this LTCCP. Christchurch people want to be able to walk and cycle this route now, it is not a behaviour we need people to shift to, we simply need to supply a safe, accessible route over this busy but extremely attractive road way to get people out of their cars and out enjoying the benefits of the Estuary.

Submission

Include provision for cycleway and pedestrian improvements early in the planning/ investigative work for structural or design improvements to the causeway.

4.6 Eastern Intersection Realignment of McCormacks Bay Road for Safety

The Trust requests that some financial provision be made to investigate improvements to this intersection as part of the comprehensive design approach being taken by the McCormacks Bay steering group.

Further that the McCormacks Bay steering group be asked to investigate and recommend an integrated solution.

Explanation

Turning out of McCormacks Bay road towards Sumner is very dangerous because traffic coming from Sumner is only visible once it comes around the cliffed corner. The intersection needs to be moved westward. However, this would involve bridging or reclaiming the eastern corner of McCormacks Bay and associated adverse drainage and environmental effects in the Bay. Shifting the roadway westward has previously been opposed by local residents because of the Council's desire to reclaim part of the Bay. The Trust considers that a roading solution acceptable to local residents could be found if ~~it were to incorporate as part of the package~~ environmental improvement to the Bay. These may relate to improvements to the functioning of the eastern-most culvert. That culvert would need to be modified anyway as part of the road realignment.

Submission

Include budget provision for road re-alignment to the eastern intersection of McCormacks Bay Road.

4.7 Scott Park Redevelopment

Ihutai Management Plan - Goal 4: Safe and Balanced Recreation

Target 3: Improved public access and facilities for recreational activities are provided at appropriate sites around the Estuary.

Recent consultation carried out over the current uses and future needs of groups utilising Scott Park, highlighted the need for fewer groups in order to ease congestion and aid public safety. Logically, because of its location, Scott Park would be better utilised as a water sports park only. This is a difficult process to accommodate but is the correct decision in the Trust's view for future improved use of this estuarine/marine area.

Submission

Provide budget to allow for the subsequent relocation of non-water sports groups at Scott Park to relocate to areas close by

4.8 Tunnel Road Bridge Pedestrian Access

Ihutai Management Plan Goal 4: Safe and Balanced Recreation

Target 3: Improved public access and facilities for recreational activities are provided at appropriate sites around the Estuary.

The Trust supports the provision of pedestrian and cycle access being provided on the Tunnel Road Bridge in order to provide a complete one way route from the old Steam Wharf by the Ferry Road/Tunnel Road roundabout to Heathcote and return. We understand this provision is being sought by Heathcote residents but we envisage that it would have a very wide use by the general public as this is a popular walking/cycling route which brings people close to the very enjoyable river/Estuary experience.

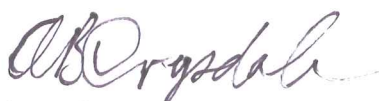
Submission

Provide budget to create pedestrian and cycle access on the Tunnel Road Bridge.

The Trust wishes to thank the Christchurch City Council for the opportunity to submit the above issues for the consideration of Councillors deliberating on the City's needs for the next ten years.

We look forward to the opportunity of submitting on these issues verbally and answering any questions they may have.

Yours faithfully



Alex Drysdale
Chairperson

Appendix One

1. We note that the Council has identified nine community outcomes it wishes to achieve with the implementation of its 2009/19 Community Plan.
2. We believe seven of these outcomes, as listed in Table 1, directly reflect the work of the Trust and underpin the budget allocations we are seeking in our LTCCP submission.

Table 1: Community Outcomes (Our numbering)
<i>Our diversity is seen, heard, valued and celebrated. All people feel a sense of belonging and participate in the community.</i>
The entire Avon-Heathcote Ihutai Estuary was traditionally considered a taonga and was a regulated mahinga kai for Ngai Tahu particularly Te Ngai Tuahuriri. Unfortunately, due to the long period of degradation of the Estuary, Ngai Tuahuriri now feel a sense of estrangement from their rightful place as guardians of the Estuary. At a meeting of the Te Ngai Tuahuriri and the AHEIT Board in July 2005, representatives of Ngai Tuahuriri Runanga expressed great appreciation for the work the Trust was doing to restore Ihutai. We see our partnership with Maori as critical to our success as current and future guardians of the Estuary.
2. A City of People who Value and Protect the Natural Environment
<i>Our lifestyles reflect our commitment to guardianship of the natural environment in and around Christchurch. We actively work to protect, enhance and restore our environment for future generations.</i>
In partnership with both the City and Regional councils the essential purpose of our Trust is to act as guardian of the Avon Heathcote Estuary/Ihutai, for and on behalf of the community of Christchurch. Our commitment together is to protect, enhance and restore the Estuary environment for future generations. We, the Trust, are actively seeking to carry out this commitment through the projects we have identified in the Ihutai Management Plan. This Plan contains a number of important projects, which we believe must be carried out in the early years of this LTCCP in order to achieve the environmental community outcomes sought by the Council in respect to the Estuary.
3. A Well-Governed City
<i>Our values and ideas are reflected in the actions of our decision-makers. Our decision makers manage public funds responsibly, respond to current needs and plan for the future.</i>
This year Christchurch residents have shown considerable concern about the degraded state of Christchurch rivers. We would submit that improving river health and thereby the health of the Estuary is a top environmental priority for our decision makers to respond to. This submission outlines many important ways the city can contribute to cleaning up our rivers.

Table 1 continued
4. A Healthy City
<i>We live long, healthy and happy lives.</i>
<i>We will know when we are succeeding when: - our city environment supports the health of the community.</i>
We are looking forward to the water quality improvements in the Estuary which will come as a result of the ocean outfall being made operative in June this year. Our focus of concern now is for the health of the Avon and Heathcote Rivers and the impact their health has on the Estuary.
5. A City for Recreation, Fun and Creativity
<i>We value leisure time and recognize that the arts, sports and other recreational activities contribute to our economy, identity, health and wellbeing.</i>
The Estuary is undoubtedly the most well used natural water body for aquatic based sports in Christchurch. There are at least ten types of recreational users of this resource and many thousand of ratepayers who enjoy the leisure and sporting recreational opportunities it offers them. This number will grow rapidly once the waste treatment discharge is removed from the Estuary. Council's investment in the Estuary over the next ten years needs to reflect this usage.
6. A City of Life Long Learning
<i>Our learning opportunities help us to participate in the community and the economy. Quality education is available for people of all ages.</i>
In our request for funding we have identified that a public education programme about the effects of human activities on the Estuary is crucial to improve the health of it. Many ratepayers are unwittingly polluters of our waterways and Estuary. If we can educate them about the ecological importance of the Estuary and the need for its protection we will be making an incalculable difference not only to the Estuary but also to the knowledge and understanding of our citizens.
7. An Attractive and Well-designed City
<i>Christchurch has a vibrant centre, attractive neighborhoods and well-designed transport networks. Our lifestyles and heritage are enhanced by our urban environment.</i>
The Avon Heathcote Estuary/ Ihutai is renowned nationally as one of the major aesthetic jewels in Christchurch's crown. Its natural beauty is central to the attractiveness of living in the eastern suburbs. Issues such as reclamation and the continued pollution of this water body threaten this status and must be continually monitored and improved upon.