

**From:** [Sarah Drummond](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** FW: Urgent: Revised Submission Whitewater NZ et al CLWRP Var 4 Plan Change Oct 2015 EMAIL:06110231  
**Date:** Tuesday, 13 October 2015 10:15:51 a.m.  
**Attachments:** [{cid2354B72C0AF6FA4097F5129C0F3D55C4@ecan.govt.nz}Submission Whitewater NZ et al CLWRP Var 4 Plan Change Oct 2015.docx](#)  
**Importance:** Low

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For trimming please the replacement White-water submission

Thanks  
Sarah

**From:** ECInfo [mailto:ecinfo@ecan.govt.nz]  
**Sent:** Tuesday, 13 October 2015 10:13 a.m.  
**To:** Sarah Drummond  
**Subject:** FW: Urgent: Revised Submission Whitewater NZ et al CLWRP Var 4 Plan Change Oct 2015 EMAIL:06110231  
**Importance:** Low

Hi Sarah

I sent this through yesterday, however the attachment didn't get through for some reason cannot send through to mailroom.

Let me know if this one comes through.

Thanks

Kiri

----- Original Message -----

**From:** Rankin Douglas Alexander  
**Received:** 12/10/2015 4:06 p.m.  
**To:** ECInfo; Environment Canterbury; Services Customer; Services Customer  
**Subject:** Urgent: Revised Submission Whitewater NZ et al CLWRP Var 4 Plan Change Oct 2015

Dear Sirs/Mesdames

Please find enclosed an updated version of a joint submission from Whitewater NZ and various other parties on Plan Change 4 for the CLWRP. Please discard the earlier version and replace it with this one, which is from ten joint submitters.

Please reply by return email to confirm that this submission has been received.

Many thanks for your help.

Yours faithfully

Douglas A Rankin  
Conservation Officer  
Whitewater NZ

# **SUBMISSION ON VARIATION (PLAN CHANGE) 4 OF THE CANTERBURY LAND AND WATER REGIONAL PLAN**

To: Environment Canterbury  
P O Box 345  
Christchurch 8140

**Name of Joint Submitters:**

Whitewater NZ (Inc)  
Whitewater Canoe Club (Inc)  
BugSports Club (Inc)  
University of Canterbury Canoe Club (Inc)  
Arawa Canoe Club (Inc)  
Down River Kayak Club (Inc)  
New Zealand Rivers Association (Inc)  
Rangitata Rafts (2012) Ltd  
Peel Forest Outdoor Centre (Charitable Trust)  
Orari River Protection Group (Inc)

Address for service: C/o Doug Rankin  
Conservation Officer  
Whitewater NZ (Inc)  
28 Waipara Street  
Cracroft  
Christchurch 8025

Phone: (03) 942 1302 or 027 843 4447

Email: [conservation@rivers.org.nz](mailto:conservation@rivers.org.nz); [doug.rose.rankin@paradise.net.nz](mailto:doug.rose.rankin@paradise.net.nz)

This is a joint submission on the Proposed Variation 4 Amendments to the Canterbury Land and Water Regional Plan (CLWRP) notified in September 2015.

## **Background**

1. This is a joint submission on behalf of Whitewater NZ, the Whitewater Canoe Club (WWCC), the BugSports Club (BSC), the University of Canterbury Canoe Club (UCCC), the Arawa Canoe Club (ACC), the Down River Kayak Club (DRKC), the New Zealand Rivers Association (NZRA), Rangitata Rafts (2012) Ltd (RRL), the Peel Forest Outdoor Centre (PFOC), and the Orari River Protection Group (ORPG).

2. Whitewater NZ, formerly the New Zealand Recreation Canoeing Association, represents more than 1,000 canoe and kayak club members and individual members from around New Zealand. The national body helps to look after the interests of river paddlers with respect to access, safety, and river conservation among other matters. There are about 10,000 active whitewater paddlers throughout New Zealand.
3. The WWCC is based in Christchurch and has about 200 members who mainly participate in whitewater kayaking. It has been in existence for about 30 years. The BSC is based in Christchurch and has about 80 members, a number of whom participate in river bugging, and has been in existence for about 15 years. The UCCC is based in Christchurch and has about 300 members, who mainly participate in whitewater kayaking and has been in existence for about 43 years. The DRKC based in Christchurch is about 8 years old and has about 70 members, who mainly participate in downriver race kayaking. The WWCC, BSC, UCCC and DRKC are affiliated to Whitewater NZ. The ACC based in Christchurch is 49 years old and has about 300 members who mainly participate in downriver race kayaking. The New Zealand Rivers Association (formerly the New Zealand Rafting Association) is the professional body that trains and registers commercial rafting guides, and looks after the interests of commercial rafters, throughout New Zealand. It has been in existence for about 40 years. RRL are a white water rafting company who raft the Gorge on the Rangitata River. Commercial rafting has been operating down the Gorge since 1986 and RRL have been running under the current ownership since 2012. They take between 3000-5000 clients down the river each season. PFOC is a Charitable Trust established in 1994 that provides opportunities for all to experience quality outdoor and environmental programmes designed to educate, challenge and inspire. It focuses significantly on white water activities catering to about 500 participants per year. The ORPG is a community based organisation of keen river enthusiasts whose aim is to prevent any degradation of the Orari River. They have been active in developing the Orari River Integrated Management Plan.
4. White water paddlers, whether rafters or kayakers, are a significant sector of the community that use rivers throughout Canterbury for recreation. Such paddlers include Canterbury residents as well as others from outside the region, including New Zealand residents and overseas visitors. Some are club members but many are not. A number of Canterbury rivers have nationally outstanding and significant reaches of whitewater on them, including some that are recognised by Water Conservation Orders but others that are not, and some which are used by commercial rafting and jet boating companies.

## Overview

5. The wider Canterbury region encompassed by the Canterbury Regional Council is blessed with many outstanding white water rivers that are widely used by our members and other

paddlers and rafters<sup>1</sup>. Many local rivers are also used by other sectors of the urban and rural communities for fishing and swimming and other recreation activities.

6. Many of our rivers, however, are a shadow of their former selves, as the taking of water for farming has strongly reduced their flows and mauri, and as pollutants from farming have degraded their water quality. There is mounting pressure to continue expanding irrigation development especially for dairy farming, but the effluent that that farming generates poses a significant threat to our environment, and to the flows and health of our rivers, and their suitability and availability for recreation.
7. The joint submitters strongly support the inclusion of recreational values relating to their use of rivers and lakes in the CLWRP. We recognize that objectives and policies to cater for recreational interests are mentioned in the plan, but we remain concerned that little has been done to address the specific needs of recreation groups and members of the **wider** Canterbury community who enjoy and use the many amenity and recreation values provided by Canterbury's rivers. In particular, we are concerned that the CLWRP is relatively silent on rules on how recreation values will be recognized and dealt with when activities, such as river bed disturbance, livestock and vegetation encroachment in river and lake beds, flood protection works, riparian activities, and activities adjacent to riparian activities, will encroach on recreation and landscape values (the latter are often an important component of recreation values).
8. To address these concerns the joint submitters want inclusion of a Schedule (Proposed Schedule 24: Appendix I) of key rivers used for whitewater recreation included in the CLWRP. Other schedules are also needed for other recreation values, or need expanding, such as canyoning, swimming, jet boating, fishing, sightseeing, picnicking and other recreation uses, which can be added in the future. Such schedules will be supported by other organisations<sup>2</sup> and will add significant richness to the CLWRP and will be of value both to resource planners as well as resource managers.
9. In addition, a number of rule changes are needed in the CLWRP to reflect the recreation values in the Proposed Schedule. The changes are required to recognise and appropriately address the Proposed Schedule values in the CLWRP, and in line with the various objectives and strategic policies of the CLWRP, the outcomes and targets of the Canterbury Water Management Strategy (CWMS), the Canterbury Regional Policy Statement 2013 (CRPS), the National Policy Statement of Freshwater Management 2014 (NPS), and requirements of the Resource Management Act (RMA). The recommended changes are outlined below.

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<sup>1</sup> D A Rankin, N Earnshaw, I M G Fox and T Botterill, Kayaking on Canterbury Rivers: reaches, values and flow requirements. Report No.R14/31, Environment Canterbury Regional Council, February 2014

<sup>2</sup> For example, Jet Boat New Zealand supports insertion of a Schedule listing its key river reaches and their values in Canterbury in the CLWRP (R Gerard, Conservation Officer, JBNZ, personal communication, October, 2015)

## **The Case for the Proposed Schedule 24 of Key Whitewater Recreation Reaches on Rivers in Canterbury:**

### **Objectives and Strategic Policies Relevant to Recreation Values in the CLWRP**

10. A number of Objectives in the CLWRP are considered relevant to the use by and the value of water to recreation users. They include Objectives 3.6, 3.7, 3.11, 3.12, 3.14, 3.15, 3.16 and 3.19. In essence these Objectives recognise water as being essential to all life and is respected for its intrinsic values; fresh water is managed prudently with many in-stream and out-of-stream values; water is an enabler of economic and social wellbeing; regard is to be had for community outcomes for water quality and quantity; outstanding water bodies are to be healthy; parts of lakes and rivers that are valued for recreation are suitable for contact recreation; and, natural character values of freshwater bodies are protected.
11. Strategic policies 4.3 and 4.5 in the CLWRP are considered relevant to the use by and the value of water to recreation users. In essence water is to be managed through the setting of limits to safeguard the environment, customary uses, drinking water as first order priorities and recreation, irrigation, electricity generation and other economic activities as second order priorities.
12. Such Objectives and Strategic Policies are to be considered not alone but as part of all the Objectives and Strategic Policies of the CLWRP along with other enabling policies and rules, including those in the subregional chapters.

### **Identifying and Providing for Non-motorised Whitewater Recreation Values in the CLWRP**

13. In order to be able meet these all the Objectives and Strategic Policies and properly provide for recreation, and in particular parts of lakes and rivers valued for recreation, and in order for them to be suitable for contact recreation, it is essential that such areas of value to recreation are clearly identified. Thus, the Proposed Schedule 24 that we request be inserted into the CLWRP is clearly entirely consistent with, and is needed for, the proper execution of the CLWRP, along with other Schedules for other users.
14. Without such critical information resource planners and consenting parties will not be able to discharge their duties appropriately with respect to meeting the aims and outcomes of the CLWRP. This applies equally to whitewater as well as other recreation resource users and their values, and when considering specific activities and/or development proposals or consenting processes, and their impacts on such values.
15. Such issues have arisen to date within the Zone Committee (ZC) processes used as part of the construction process for the CLWRP. Claims that river recreation values have been taken

into account in constructing Zone Implementation Plans (ZIPs)<sup>3</sup> are perhaps questionable. For example, in all zones the detailed flow data needed in the key reaches or locations to provide for the valued paddling reaches and other recreation values that exist on rivers, and for use in setting minimum flows, were not available (and are still not available in many cases) when the ZIPs were constructed. Key recreation values do not feature in ZIPs and some that do are trivial and inaccurate<sup>4</sup>.

16. The proposed Schedule of key rivers or parts of rivers for whitewater recreation has been distilled from widespread consultation with key experts in river whitewater recreation in Canterbury and throughout the country<sup>5</sup>. The values described in this proposed schedule are existing values, although a number have been degraded over recent time, particularly from large water takes and reductions in water quality in a number of waterways. Their values will remain until the rivers lose their values. Loss of values may occur because the flows in them become too small for retention of the whitewater values, the river beds are destroyed or catastrophically altered for some reason, or users are excluded from the resources because of gross pollution, toxic algal blooms or fecal contamination, which render them unsuitable or unsafe for primary contact recreation.
17. The proposed Schedule represents the best examples of river reaches of different types suitable for paddlers of different abilities and so provides a habitat within the region on which whitewater recreation can thrive.
18. The proposed Schedule is not up for debate in the sense that these values do or do not exist, or can only be constructed via discussion for inclusion or exclusion in separate Zone Committee processes that are being used to populate subregional chapters of the Plan. The list of river reaches represents well established and valued river runs in Canterbury and their key whitewater values for paddled and non-motorised river craft users. Zone Committees and their subregional plans may choose not to recognise or record such values, especially due to the composition of the Zone Committees, the value sets of their members, and the influences and processes they are subjected to in the 'collaborative process'. It is our

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<sup>3</sup> Canterbury Water Management Strategy Targets Progress Report June 2015, Report Number R15/82, Environment Canterbury, 2015, pp 36

<sup>4</sup> For example, Whitewater NZ submitted on the Regional Committee ZIP after the Chairman of the Regional Committee announced at a public presentation, when questioned about a minimum flow to protect the stated but limited fisheries values of the Ashley Gorge mentioned in the ZIP versus the well-known and highly regionally significant whitewater recreation values, that 'he and other individuals had considered the recreation values of the Ashley Gorge and did not even think they were even locally significant'. As I understand it this matter was never discussed or agreed by the Regional Committee. Our values have yet to be recognised appropriately.

<sup>5</sup> D A Rankin, N Earnshaw, I M G Fox and T Botterill, Kayaking on Canterbury Rivers: reaches, values and flow requirements. Report No. R14/31, Environment Canterbury Regional Council, February 2014; Statement of evidence of Grant South on behalf of the New Zealand Rivers Association (Inc) and Whitewater NZ (Inc), Presented to the Hearing Commissioners considering the Canterbury Land and Water Regional Plan, February 2013; Statement of evidence of Graeme James Boddy on behalf of the BugSports Club (Inc) and Whitewater NZ (Inc), Presented to the Hearing Commissioners considering the Canterbury Land and Water Regional Plan, February 2013.

collective wish as a group of community users of rivers to have our values recorded as an Appendix in the CLWRP as outlined in Appendix I.

19. Such Schedules for recreation or recreation related values and other values already exist in the CLWRP. For example, Schedule 6 lists areas known for bathing in rivers and lakes (albeit a very brief incomplete list, e.g., rivers such as the Ashley and Waimakariri are omitted as are many other places on other rivers), Schedule 17 lists known and probable inanga and salmon spawning sites, and Schedules 18-23 list key Ngai Tahu values. Further Schedules, and expansion of some, are needed to complete the listing of valued recreation sites in the CLWRP.
20. Inclusion of a Schedule of valued white water recreation river reaches in the CLWRP also requires reference to how the Schedule might be used in the CLWRP, with respect to those values. Some policy and rule revisions are proposed in the Plan 4 changes to the CLWRP at present. They include reference to a bathing site Schedule and a Schedule of inanga and salmon spawning sites, which are designed to recognise and protect recreation and in part indigenous fauna values. These changes have been used as a guide and where appropriate have been added to, as outlined below. The revised provisions in the Plan have been considered and analysed and our recommendations made, in order to appropriately recognise our recreation values within the CLWRP.
21. Key issues important to white water recreation values are:
  - sufficient water and bed features and river gradient to generate white water
  - water quality suitable for contact recreation, which the sport involves, and particularly so that users are not excluded from valued recreation sites from inappropriate water quality, fouling from animal excrement or toxic algal blooms
  - retention of bed and bank features able to generate white water
  - retention of landscape and natural environment and natural feature values that are a significant component of many rivers valued for recreation.

## **Outcomes and Targets of the CWMS and their Relevance to the Proposed Schedule**

22. When the ECan Act (2010) was passed into law, Environment Canterbury, when developing the Land and Water Plan for the region, was to have particular regard to the vision and principles of the CWMS. One of the 10 target areas with which to measure the success of the CWMS vision is provision for recreation and amenity opportunities<sup>6</sup>, which contains a set of targets from 2010, and by 2015, 2020 and 2040. In recent reports<sup>7</sup> progress against targets has been detailed, which reveals that only limited progress has been made in meeting the 2010 and 2015 targets and that the targets have basically not been met. Much of the collation and identification of valued recreation sites in zones throughout the region has not

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<sup>6</sup> Canterbury Water Targets, Report E11/08, Environment Canterbury Regional Council, March 2012

<sup>7</sup> Canterbury Water Management Strategy Targets Progress Report June 2013, Report Number R13/89, Environment Canterbury, 2013; Canterbury Water Management Strategy Targets Progress Report June 2015, Report Number R15/82, Environment Canterbury, 2015

been done, and nor has any assessment been made to determine whether environmental flows are not met and require change to meet recreational outcomes (2015 target). No work has been reported to show whether there is a positive trend in the availability and/or quality of recreational opportunities in each zone (2015 target).

23. In order to meet these and future targets it is essential that the necessary identification of valued recreation sites be documented throughout zones so that such data is available for resource planners to utilise. Thus, insertion of Proposed Schedule 24 into the CLWRP is compatible with the need to have key recreation sites identified throughout the region, and in order to progress and meet various targets of the CWMS, and particularly those relating to recreation and amenity opportunities.

## **The CRPS and its Relevance to the Proposed Schedule**

24. The CRPS<sup>8</sup>, which gives effect to the NPS, has been developed to provide guidance for the integrated and sustainable management of water and land resources throughout the region. Objectives and Policies have been constructed to achieve these goals and matters to be addressed in comprehensive management plans (such as in the CLWRP) for integrated solutions to freshwater management are outlined in Policy 7.3.9 and in Appendix 2.
25. In Appendix 2 of the CRPS clear guidelines are given for elements expected to be covered in the CLWRP and the data that needs to be gathered so that the CLWRP can be effectively implemented. In subsections 10 to 12 the need to identify recreational, aesthetic, wilderness, amenity and other community values associated with fresh water bodies; controls required on activities to maintain those values; and any areas where these values can be enhanced as part of managing water or mitigating effects of water harvest or storage proposals, must be addressed.
26. Therefore, the inclusion of a schedule that identifies key valued white water recreation sites throughout the region, such as Proposed Schedule 24, is clearly consistent with the objectives and policies of the CRPS. This data is particularly required to support integrated water management, and in particular Policy 7.3.9, and the need for valued recreation site data in the development of comprehensive management plans, such as the CLWRP and the sub-regional chapters.

## **The NPS and its Relevance to the Proposed Schedule**

27. The NPS<sup>9</sup> gazetted in July 2014 states in the preamble that it

*‘sets out objectives and policies that direct local government to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits. The national policy statement is a first step to improve freshwater management at a national level’.*

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<sup>8</sup> Canterbury Regional Policy Statement 2013 (V2), Report No. R14/22, Environment Canterbury 2013

<sup>9</sup> National Policy Statement for Freshwater Management 2014, New Zealand Government, gazetted July 2014.



The NPS also

*‘sets national bottom lines for two compulsory values – ecosystem health and human health for recreation – and minimum acceptable states for other national values.’ .... ‘Overall freshwater quality within a region must be maintained or improved. ....’*

28. As discussed in the preceding section, if provision is to be made for maintaining water quality and human health for recreation, it is essential that valued areas for recreation in the Canterbury region are identified so that the Objectives and Policies of the NPS can be realised in Regional Plans. Therefore, the inclusion of a schedule that identifies key valued white water recreation sites throughout the region in the CLWRP, such as Proposed Schedule 24, is clearly consistent with the objectives and policies of the NPS.

### **Proposed Revisions to the Plan Change 4 to the CLWRP along with inclusion of the Proposed Schedule 24 of Key White Water Recreation Reaches on Rivers in Canterbury**

29. The Plan changes requested and reasons for them are outlined below.

Provision	Support/ Oppose	Feedback	Change Sought (in bold, italics and underlined)
4.31	Support and oppose in part	<p>This policy sets out to prevent and minimise damage to natural features and values of water bodies by controlling livestock access to such areas. In particular the policy is aimed at preventing degradation of aquatic ecosystems, protecting water quality at a limited number of bathing sites and fish spawning habitat.</p> <p>However, the policy does not include reference to degradation at recreation sites, which it needs to.</p> <p>The policy also does not go far enough to protecting river water quality that is key to other important freshwater recreation values, such as recreation other than swimming, that involves primary contact with freshwater including canoeing, kayaking, rafting, river bugging, pack floating, alpacka rafts, canyoning, and picnicking and generic water based activities where people might ‘mess about’ in various water craft such as tyre tubes, lilos, sit on kayaks, home-made rafts etc. Exposure to harmful pathogens from stock excrement poses a very real health risk to humans immersed in freshwater environments when undertaking recreation activities such as those above.</p> <p>The policy is also restricted to a very limited number of freshwater bathing sites (Schedule 6) and this list should be expanded.</p> <p>A new schedule (24), and other schedules yet to be produced, should be added to the Plan to recognise recreation and amenity values provided by the region’s waterbodies. The kayaking, canoeing, river bugging and rafting recreation values in Proposed Schedule 24 are recognised in recent studies<sup>10</sup> and evidence prepared for the Canterbury Land and Water Plan Hearings<sup>11</sup>.</p>	<p>Change wording to say, ‘ and degradation of aquatic ecosystems <b><u>and recreation sites</u></b> and inanga .....’ and</p> <p>‘(b) ....<u>listed in Schedule 17A, <b>key white water recreation sites listed in Schedule 24</b></u>, inanga and ....’</p>

<sup>10</sup> D A Rankin, N Earnshaw, I M G Fox and T Botterill, Kayaking on Canterbury Rivers: reaches, values and flow requirements. Report No.R14/31, Environment Canterbury Regional Council, February 2014.

<sup>11</sup> Statement of evidence of Grant South on behalf of the New Zealand Rivers Association (Inc) and Whitewater NZ (Inc), Presented to the Hearing Commissioners considering the Canterbury Land and Water Regional Plan, February 2013; Statement of evidence of Graeme James Boddy on behalf of the BugSports Club (Inc) and Whitewater NZ (Inc), Presented to the Hearing Commissioners considering the Canterbury Land and Water Regional Plan, February 2013.

Provision	Support/ Oppose	Feedback	Change Sought (in bold, italics and underlined)
		Inclusion of schedule 24 is consistent with meeting the National Policy Statement of Freshwater Management 2014 (NPS), the Canterbury Regional Policy Statement 2013 (CRPS) and various objectives and strategic policies of the Canterbury Land and Water Regional Plan (CLWRP) and is consistent with the Canterbury Water Management Strategy (CWMS). Without these revisions the recreation values in a number of waterways may not be recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS, NPS, and requirements of the RMA.	
4.85A	Support and oppose in part	This policy seeks to protect key waterbody values through restricting inappropriate activities in beds of lakes and rivers. However, it does not go far enough in also recognising and protecting valued key recreation resources and sites, which rely on non-disturbance of river beds for virtually all of their key features (e.g., swimming holes need retention of their depth and shape and flow to remain functional; white water resources and features for white water recreation need bed and/or rock features as well as flow and bed gradient retained to produce valuable white water hydraulic features and remain functional). Without these revisions the recreation values in a number of waterways may not be recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS, NPS, and requirements of the RMA.	Change wording to say, ' <u>Indigenous biodiversity, habitats of indigenous fauna and flora, <b>key recreation sites</b>, and the natural character of Canterbury's braided river systems <b>are</b> preserved through: .....</u> '
4.86	Support and oppose in part	This policy aims to manage the impacts of activities on beds of waterbodies and some key values. Just as for policy 4.31, recognition of impacts of activities in waterbody beds on recreation values is required within the plan, in order to meet the aims of the plan with respect to recreation and amenity values. If this is not done then the plan will not be able to meet its objectives and strategic policies with respect to recreation and amenity values nor the objectives and policies of the CRPS or objectives and policies of the NPS. Proposed Schedule 24 identifies a number of key recreation sites consistent with the proposed changes sought and other schedules need to be added to the Plan for other recreation activities and sites. Without these revisions the recreation	Change wording to say, ' <u>(a) the character and channel characteristics <b>and bed features</b> of rivers, <b>including those at key recreation sites</b>, and including the variable channel ....</u>

Provision	Support/ Oppose	Feedback	Change Sought (in bold, italics and underlined)
		values in a number of waterways may not be recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS, NPS, and requirements of the RMA.	
4.86A	Support		
4.86B	Support		
4.86C	New Policy to support 4.86	Just as policies 4.86A and 4.86B explicitly refer to protection of inanga spawning sites from impacts of activities on beds of waterbodies, a new policy is required to provide protection for key recreation sites, including such as those listed in Proposed Schedule 24, so that these are maintained or enhanced as required under the CWMS targets <sup>12</sup> and the CLWRP, CRPS and NPS.	Insert a new policy to say ' <b><u>Key recreation sites are protected through avoiding activities within the beds and margins of lakes, rivers, hapua, wetlands, coastal lakes and lagoons that may damage recreation sites, and where these activities cannot be avoided, the use of best practicable options to minimise all impacts and retain or restore key features are utilised.</u></b> '
5.71	Support and oppose in part	Rule 5.71 prohibits the use and disturbance of the bed (including the banks) of a lake or river by large animals that may lead to degradation of inanga or salmon spawning habitat, community water supply zones, bathing sites and spring fed plains rivers. However, the rule does not extend far enough to protect the water quality at other key recreation and amenity sites, where primary water contact is often if not always involved, such as those listed in the proposed Schedule 24. In order to meet the requirements of the CWMS targets, the CLWRP and the CRPS, a new subsection following on from subsection 3 of this rule needs to be added.	Insert a new subsection of the rule to say ' <b><u>3A. Within 1,000 m upstream and in the bed of a key recreation river reach listed in Schedule 24; or</u></b> '
5.138	Support and oppose in part	Rule 5.138 permits, provided certain conditions are met, the construction, maintenance, and removal of flood defences in or under the bed of a lake or river. In addition to the provision that the activity is not in, on, or under the bed of high naturalness water bodies, within inanga or salmon spawning sites, provisions in the rule need to be extended to assist with	Change subsection 2 of the rule to say '...river or lake listed as a high naturalness waterbody in Sections 6 to 15, <b><u>or within a key river recreation reach listed in Schedule 24,</u></b> or <u>within an inanga or salmon ...</u> '.

<sup>12</sup> A target from 2010 was to 'maintain the existing diversity and quality of water-based recreational sites, opportunities and experiences' and a target by 2015 was to show 'a positive trend in the availability and/or quality of recreational opportunities in each zone'; Canterbury Water Targets, Canterbury Water Management Strategy, Report E11/08, Environment Canterbury, 2012.

Provision	Support/ Oppose	Feedback	Change Sought (in bold, italics and underlined)
		maintenance of existing key river recreation reaches as listed in Proposed Schedule 24. Without this revision the recreation values in a number of waterways may not be recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	
5.140	Support and oppose in part	Rule 5.140 permits, provided certain conditions are met, temporary structures and diversions associated with undertaking activities in Rules 5.135 to 5.139, military training activities or artificial watercourses. One proviso is that the activity is not undertaken in an inanga or salmon spawning site listed in Schedule 17 or in any such habitat during the spawning season. This proviso needs to be extended to ensure that key recreation sites such as those in Schedule 6 and in Proposed Schedule 24 are also included in order to recognise and appropriately address such values under the CLWRP and in line with the CWMS, CRPS and NPS.	Change subsection 1 of the rule to say 'The activity is not undertaken in an inanga or salmon spawning site listed in Schedule 17, <b><u>in any freshwater bathing sites listed in Schedule 6, or within a key river recreation reach listed in Schedule 24, or undertaken in any .....</u></b> '
5.148	Support and oppose in part	Rule 5.148 permits gravel extraction from the bed of a lake or river provided certain conditions are met. In addition to conditions designed to protect certain wildlife values and habitat, conditions to recognise recreation values also need to be inserted into the plan so that such sites remain protected from inappropriate gravel extraction. This will ensure such values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	Change subsection 9 of the rule to say 'The activity is not undertaken in an inanga or salmon spawning site listed in schedule 17, <b><u>in any freshwater bathing sites listed in Schedule 6, in any key river recreation sites listed in Schedule 24, or in any inanga ....</u></b> '
5.149	Support		
5.150	Support		
5.151	Support and oppose in part	Rule 5.151 permits temporary structures and diversions associated with taking of gravel provided certain conditions are met. As for Rule 5.148, extra conditions to recognise and provide for recreation values also need to be inserted into the plan so that such sites remain protected from inappropriate gravel extraction. This will ensure such values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	Change subsection 1 of the rule to say 'The activity is not undertaken in an inanga or salmon spawning site listed in schedule 17, <b><u>in any freshwater bathing sites listed in Schedule 6, in any key river recreation sites listed in Schedule 24, or in any inanga ....</u></b> '
5.152	Support and	Rule 5.152 permits temporary discharges to water of contaminants associated with taking of gravel provided certain conditions are met. As for	Change subsection 2 of the rule to say 'The activity is not undertaken in an inanga or salmon spawning

Provision	Support/ Oppose	Feedback	Change Sought (in bold, italics and underlined)
	oppose in part	Rule 5.148 and 5.151, extra conditions to recognise and provide for recreation values also need to be inserted into the plan so that such sites remain protected from inappropriate gravel extraction. This will ensure such values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	site listed in schedule 17, <b><i><u>in any freshwater bathing sites listed in Schedule 6, in any key river recreation sites listed in Schedule 24</u></i></b> , or in any inanga ....'
5.154	Support and oppose in part	Rule 5.154 permits the damming of water in the bed of a river provided certain conditions are met. However, extra conditions to recognise and provide for recreation values also need to be inserted into the rule so that such sites remain protected from inappropriate damming. This will ensure such values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	Change subsection 2(f) of the rule to say 'The dam is not located in a river listed as a high naturalness river in Sections 6 to 15, <b><i><u>in any river bathing sites listed in Schedule 6, in any key river recreation sites listed in Schedule 24</u></i></b> , or in the mainstem of any river; and'
5.155	Support and oppose in part	Rule 5.155 makes the damming of water in the bed of a river according to rule 5.154 a discretionary activity provided certain conditions are met. However, extra conditions to recognise and provide for recreation values also need to be inserted into the rule so that such sites remain protected from inappropriate damming. This will ensure such values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	Change subsection 2 of the rule to say 'Any new dam is not located in a river listed as a high naturalness river in Sections 6 to 15, <b><i><u>in any river bathing sites listed in Schedule 6, in any key river recreation sites listed in Schedule 24</u></i></b> , or in the mainstem of any river; and'
5.156	Support		
5.167	Support and oppose in part	Rule 5.167 makes vegetation clearance adjacent to a river bed a permitted activity provided a number of conditions are met. In addition to requiring that such clearance does not take place adjacent to a salmon or an inanga spawning site listed in Schedule 17, extra conditions are required to recognise and provide for recreation values, so that where applicable such sites remain protected from inappropriate removal of riparian vegetation. This will ensure recreation values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	Change subsection 4 of the rule to say 'The vegetation clearance does not occur adjacent to a salmon spawning or an inanga spawning site listed in Schedule 17, <b><i><u>in any river bathing sites listed in Schedule 6, in any key river recreation sites listed in Schedule 24</u></i></b> , or undertaken in any inanga ....'
5.168	Support and oppose in part	Rule 5.168 makes the use of land for earthworks adjacent to a river bed a permitted activity provided a number of conditions are met. In addition to requiring that such clearance does not take place adjacent to a salmon or an inanga spawning site listed in Schedule 17, extra conditions are required	Change subsection 4 of the rule to say 'The vegetation clearance does not occur adjacent to a salmon spawning or an inanga spawning site listed in Schedule 17, <b><i><u>in any river bathing sites listed in</u></i></b>

Provision	Support/ Oppose	Feedback	Change Sought (in bold, italics and underlined)
		to recognise and provide for recreation values, so that where applicable such sites remain protected from inappropriate removal of riparian vegetation. This will ensure recreation values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS and NPS.	<u><b>Schedule 6, in any key river recreation sites listed in Schedule 24, or undertaken in any inanga .....</b></u>
5.169	Support and oppose in part	Rule 5.169 makes the vegetation clearance and the use of land for earthworks adjacent to a river bed a restricted discretionary activity if one or more of a number of conditions in various rules are not met. In addition to the areas where discretion can be exercised, it is essential that these be extended to recognise the actual and potential adverse environmental effects on areas of significant recreation value. Alteration of the riparian margins along with widespread development and intensification of land use up to the riparian margins of land adjacent to waterways will lead to increased runoff from nutrients from land and degradation of river water quality as a result, possibly contrary to the NPS. Widespread development of land adjacent to waterways will, in some cases, lead to significant degradation of landscape and natural character and natural feature values, elements which are crucial to recreation values of many river reaches and spot locations, where recreation activities are undertaken. Appropriate modification of this rule will give the opportunity for such important community values to be recognised and considered in execution of the CLWRP, whereas at present there is no such requirement. This will help ensure recreation values are recognised and appropriately addressed under the CLWRP and in line with the CWMS, CRPS, NPS, and requirements of the RMA.	Change subsection 4 of the rule dealing with exercise of discretion to say '..... and significant habitats of indigenous fauna, <u><b>areas of key or significant recreation value</b></u> , mahinga kai areas or <u>sites .....</u> '

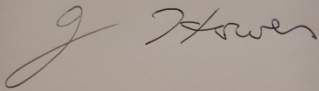
We do wish to be heard in support of this submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Signed:



*Douglas A Rankin*

Douglas A Rankin, Conservation Officer, Whitewater NZ (Inc)



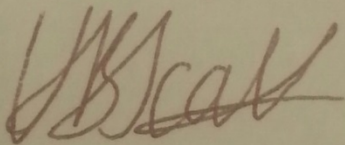
*John Howes*

John Howes, Conservation Officer, Whitewater Canoe Club (Inc)



*Dale Bethwaite*

Dale Bethwaite, President, Bug Sports Club (Inc)



*Hazel Bowering-Scott*

Hazel Bowering-Scott, Conservation Officer, University of Canterbury Canoe Club (Inc)





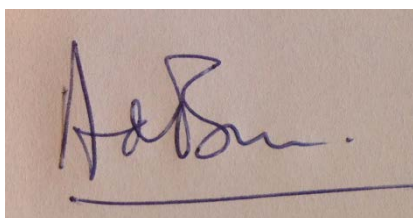
Bruce Johnston ((Secretary, Arawa Canoe Club), for Bianca Teague, President, Arawa Canoe Club (Inc)



Ian Huntsman, President, Down River Kayak Club (Inc)



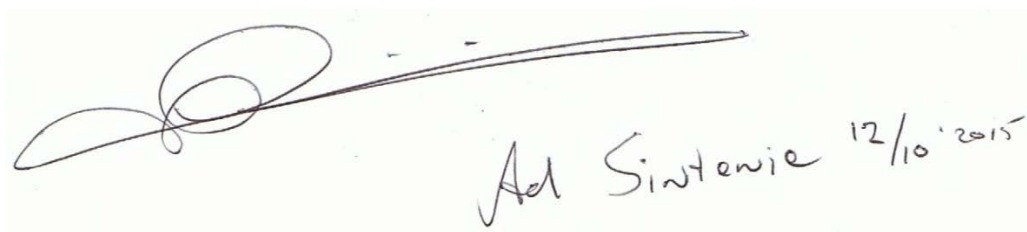
Raewyn Larcombe (Administration Officer) for Tim Marshall, President, New Zealand Rivers Association (Inc)



Andrew G Brown, Chairman of Board of Trustees, Peel Forest Outdoor Centre (Charitable Trust)



Steve Anderson, Manager, Rangitata Rafts (2012) Ltd



Ad Sintenie, Chairperson, Orari River Protection Group (Inc)

12 October 2015

## Appendix I: Proposed Schedule 24 of Key White Water Recreation Reaches on Rivers in Canterbury for insertion into the CLWRP

### Schedule 24 - Key Kayaking, Canoeing, Rafting, Cataracting and River Bugging White Water Reaches on Canterbury Rivers

Main River <sup>a</sup>	Location (and NZMG coordinates; start:finish <sup>b</sup> )	Outstanding and Significant Characteristics
Clarence/Waiau-toa River	Lake Tennyson to the Acheron confluence (2488500,5888310:2507350,5868230)	Kayaking, canoeing, river bugging and rafting values Wild and scenic character
	Acheron confluence to the sea (2507350,5868230:2587410,5892770)	Nationally outstanding kayaking, canoeing, river bugging, cataracting and rafting values Multiday remote wilderness trip Outstanding wild and scenic values from the confluence with the Acheron River to the sea including the Gates of Clarence, Middle Clarence and Sawtooth Gorges
Waiau (Waiau-uha) River and tributaries	Upper Waiau from below Malings Pass to the Hope Confluence (2480910,5886580:2473960,5845980)	Nationally outstanding kayaking, canoeing, river bugging, cataracting and rafting values Multiday wilderness trip Outstanding wild and scenic character
	Upper Boyle to SH7 Road Bridge (2464510,5854960:2459780,5854390)	Outstanding river bugging and kayaking values Wild and scenic character
	Boyle from Engineers Camp (2457190,5848720:2458760,5846640)	Kayaking, canoeing, river bugging and rafting values Wild and scenic character
	Hope from Hope Bridge & Waiau to Hanmer plains (2465160,5846460:2492160,5847510)	Kayaking, canoeing, down river racing, river bugging and rafting values
	Leslie Hills Gorge (2492160,5847510:2493570,5835500)	Kayaking, canoeing, down river racing, river bugging and rafting values
	Mason (2523700,5855770:2518260,5846750)	High Class flood kayak and canoe creek boating values
Hurunui River and tributaries	North Branch from Lake Sumner to South Branch confluence (2450620,5831390:2456910,5820220)	Nationally outstanding kayaking, canoeing, river bugging, cataracting and rafting values Wild and scenic character
	South Branch (2443690,5823740:2456120,5819650)	Kayaking, canoeing, river bugging, cataracting and rafting values Wild and scenic character
	South Branch confluence to Mandamus, including Maori Gully (2456910,5820220: 2476170,5821230)	Nationally outstanding kayaking, canoeing, river bugging, cataracting and rafting values Wild and scenic character
	Lowry Peaks gorge to SH1 bridge (2507930,5815120:2518032,5811935)	Kayaking, canoeing and rafting values Scenic values
Ashley/Rakahuri River and tributaries	From Gillespies Bridge to the Ashley Gorge Bridge (2440900,5779950:2447190,5775300)	Outstanding kayaking, canoeing, river bugging, rafting and cataracting values Wild and scenic character
	Okuku from the ford on the Okuku Pass to Lees Valley Road to Fox Creek (2456960,5794860:2460720,5784310)	Outstanding kayaking, canoeing, river bugging and cataracting values Wild and scenic character
Waimakariri River and tributaries	Waimakariri Gorge (Mt White Bridge to Gorge Bridge) (2407840,5799490:2433060,5760400)	Kayaking, canoeing, cataracting, rafting and outstanding down river racing values Outstanding wild and scenic character
	Waimakariri, Gorge Bridge to mouth (2433060,5760400:2486650,5757460)	Kayaking, canoeing, rafting and outstanding down river racing values Braided river character
Otukaikino Creek	Groynes, Belfast (2478080,5750630:2480430,5752330)	Kayak training values
Styx/Purakaunui	Christchurch	Flat water kayak training and racing values

River	(2482360,574920:2485920,5756640)	
Avon/Otakaro River	Christchurch (2477630,5742340:2487670,5742400)	Outstanding flat water kayak training and racing values
Heathcote/Opawaho River	Christchurch (2482890,5738390:2486470,5738730)	Flat water kayak training and racing values
Rakaia River	Gorge (2389880,5758340:2401480,5742410)	Kayaking, canoeing, down river racing and rafting values Wild and scenic character
	Gorge Bridge to Lowes cutting (2401480,5742410:2412170,5732420)	Down river racing kayaking values
Ashburton/Hakatere River	Bowyers Stream (2381640,5730180:2382310,5729910)	Flood kayak and canoe creek boating values
Rangitata River	Gorge (2351520,5720770:2367640,5714430)	Nationally outstanding kayaking, canoeing, river bugging, catarafting and rafting values Wild and scenic character
	Klondyke to Peel Forest (2368020,5714350:2371230,5697930)	Nationally outstanding kayaking, canoeing, and rafting values
Orari River	Upper down to and including Gorge (2347580,5701200: 2365170,5694410)	Kayaking and canoeing values
Opihi River	Gorge (2340060,5672720:2345630,5669030)	Kayaking and canoeing values
Waitaki River and tributaries	Tekapo White Water Course <sup>c</sup> (2307230,5684530:2307030,5684780)	Kayaking, canoeing and river bugging values
	Tekapo River <sup>c</sup> (2307990,5685920:2306980,5684990)	Kayaking, canoeing and river bugging values
	Pukaki River <sup>c</sup> (2282600,5664460:2285810,5659520)	Kayaking, canoeing, catarafting, rafting and river bugging values
	Ahuriri River above SH8 (2242580,5643600:2250320,5631520)	Kayaking and canoeing values Wild and scenic character
	Hooker River (2276250,5720310:2278700,5714570)	Kayaking and canoeing values Outstanding wild and scenic character
Waihao River	North Branch (2338130,5619080:2347100,5600300)	Kayaking and canoeing values (requires fresh/flood) Wild and scenic character

<sup>a</sup> A guide as to the relative importance, and more information on the nature of the values, of these different reaches for kayaking and canoeing is published in D A Rankin, N Earnshaw, I M G Fox and T Botterill, Kayaking on Canterbury Rivers: reaches, values and flow requirements. Report No.R14/31, Environment Canterbury Regional Council, February 2014

<sup>b</sup> Format for the coordinates at the start and end of the reaches is as follows: (Start Easting, Start Northing: End Easting, End Northing)

<sup>c</sup> These resources are essentially only available during controlled flow releases