

From: Mike O'Connell <Mike.OConnell@wmk.govt.nz>
Sent: Wednesday, 4 April 2018 11:22 a.m.
To: Mailroom Mailbox
Subject: LTP SUBMISSION
Attachments: WDC submission to Environment Canterbury 2018-28 Long Term Plan.pdf

To Whom it May Concern:

Please find attached our submission on Environment Canterbury's Long-Term Plan 2018-28. It is acknowledged that formal submissions closed on Monday 26 March but as per an agreement made between the councils, because of timing of this Council's monthly meeting (yesterday, 3rd April), we have been granted additional time to lodge our submission.

Please note that the Waimakariri District Council wishes to be heard with regard to this submission.

Yours sincerely

Mike O'Connell | Senior Policy Analyst

Policy and Strategy Unit

Mike.OConnell@wmk.govt.nz

Customer Service: 0800 965 468 (0800WMKGOV)

Phone: 03 311 8902 | Ext: 8870

Waimakariri District Council would like your input into deciding the 2018-28 Long-Term Plan. This plan determines the work that shapes where you live. Have your say at www.waimakariri.govt.nz/ltp

In the Matter of
Environment Canterbury's 2018/28 Long-Term
Plan

Submission by

Waimakariri District Council

March 2018

Person for Contact: Geoff Meadows (Policy Manager)



1. Introduction

The Waimakariri District Council welcomes this opportunity to comment on the Environment Canterbury 2018/28 Long-Term Plan (LTP), and reflect on the ongoing relationship between the two Councils. The Council looks forward to contributing to further collaboration through the Mayoral Forum network of Regional Forums, and welcomes the recent establishment of the Climate Change Working Group.

Council staff are also enjoying positive working relationships with Environment Canterbury staff on the range of issues of principal concern to both organisations including the Canterbury Water Management Strategy, stormwater system management, public passenger transport and efforts to improve water quality in the Kaiapoi River. These relationships play an important part in the effective and efficient operation of both organisations, to the advantage of the people living in the Waimakariri District.

The Council is, nevertheless, concerned to ensure that the amounts paid in rates by people living in its District to Environment Canterbury are soundly based. Many of our ratepayers do not distinguish readily between the amounts paid to the District Council and to Environment Canterbury, and as the organisation that collects the rates for both Councils, this Council is often viewed as accountable. It is this concern together with the appropriateness of the proposed levels of service that prompt many of the Council's comments on Environment Canterbury's 2018/28 Long-Term Plan.

2. Summary of submission

The Council has restricted its feedback to commentary on the ECan Portfolios. In brief, the matters addressed in this submission focus on:

Regional Leadership and Governance

- Council support for ECan demonstrating leadership in the freshwater management and biodiversity portfolios as well as welcoming the establishment of the Climate Change Working Group.

Freshwater Management

- Council continues to support the work of ECan with the Canterbury Water Management Strategy (CWMS), through the joint CWMS Waimakariri Zone Committee.

Biodiversity and Biosecurity

- Council supports the focus on the biodiversity and biosecurity portfolio as a strategic priority for the Region.

Hazards Risk and Resilience

- The Council applauds the establishment of the new programme of work, Climate Change Integration.

- The Council also encourages ECan to demonstrate Regional leadership to lead the Canterbury response to climate change and work with this District and others to formulate and fund considered responses in the second and third year of the LTP.
- ECan's Harbour Master is asked to take a more proactive stance in assisting the Council to improve operating navigation safety in both the Kaiapoi and lower Cam Rivers.
- The Council requests that ECan consider widening its energy portfolio to work with stakeholders on the broader matters of energy security, reliability and affordability.
- In conjunction with the Council Kaiapoi River Rehabilitation Working Party, the Council requests ECan provide base ongoing funding of \$25,000 per annum to enable its prioritised projects to be progressed.

Transport and Urban Development

- The Council supports steps being taken by ECan to better plan and invest in urban development and transport infrastructure and services.

Air Quality

- The Council welcomes the strategic focus on addressing air quality issues, especially around home heating and supports the introduction of the 'Healthier Homes Canterbury' voluntary loan scheme to assist Rangiora and Kaiapoi communities.
- The Council still has concerns around the current National Environmental Standard for Air Quality (NESAQ) being used for particulate matter (PM). The Council draws attention to the issue of anomalies associated with the NESAQ for PM₁₀ being based on exceedances rather than on annual averages.

3. Regional Leadership and Governance

Continued collaboration over the Canterbury Water Management Strategy is supported and progress being made on Waimakariri Land and Water Solutions Programme, is pleasing, particularly the progress being aimed at completing the Zone Implementation Programme Addendum (ZIPA) during the 2018 calendar year.

It is noted that biodiversity is one of ECan's two strategic priority programmes, and Council supports ECan to continue to show leadership in this programme by advancing a dialogue with Central Government to bring about recommendation #3 in the LGNZ 2017 biodiversity report¹ regarding the '*importance of a national plan and delivering joined-up action across all players*'.

Within the Hazards/Risk/Resilience programme, the Council welcomes establishment of the Climate Change Working Group, recognising that programmes and initiatives which relate to mitigation of and adaptation to climate change are vitally important for the Canterbury region.

The Council also supports ECan's role in the increasingly effective management of hazardous land and waste and associated collaboration with this Council on these issues.

¹ [Addressing New Zealand's Biodiversity Challenge](#)

Plans, Consenting and Compliance

The Council acknowledges ECan's assistance with the District Plan Review.

This Council's consent processing is moving towards full digitisation as part of the Council's mobile data project, which will ultimately lead to data improvement for compliance work and will assist this Council to match (and hopefully exceed) the listed targets under 3.7.1 and 3.7.2 (on p58).

The Council considers that the ECan programme generally aligns with our longer terms goals for the collection and analysis of compliance data. Feedback from our community does however point to concern about the proactivity of ECan in achieving consent compliance on a number of fronts.

4. Freshwater Management

The Council continues to support the work of ECan with the Canterbury Water Management Strategy (CWMS), through the joint CWMS Waimakariri Zone Committee. It is important that this initiative continues to be seen as involving wider stakeholder collaboration including the close relationship between our two Councils.

Of importance to the District is ongoing work on the Solutions Package and in regard to that programme of work, the Council acknowledges the commendable leadership ECan (in particular, via ECan Chief Scientist, Dr Tim Davie) has demonstrated in fronting the groundwater issue presentations to elected members and the media.

Management Plan for the Ashley-Rakahuri Estuary

The need to protect, and educate people about, the significant wildlife and cultural values associated with the Ashley-Rakahuri Estuary (Te Akaaka) was highlighted during the *Northern Pegasus Bay Bylaw 2016*² submission process. The Hearing Panel considered that a management plan, incorporating a long term vision and agreed outcomes, needed to be developed for the estuary and this was included as **action ARE.2** in the Bylaw Implementation Plan.

The development of a management plan for Te Akaaka may be considered by the Waimakariri Zone Committee as part of their Solutions Package for the ZIP addendum, and it is important that sufficient budget is included for this purpose within the next three years.

The Council supports this inclusion and highlights the strong views expressed by submitters to both the *Northern Pegasus Bay Bylaw 2016* and the Bylaw Implementation Plan, the significance of the wildlife in the estuary, and the progress needed to achieve the following agreed aspiration contained within the Implementation Plan:

'The community, ECan, DOC, Te Ngāi Tūāhuriri, Fenton Reserve Trustees and the Council recognise the estuary is a wetland of international significance and actively seek to protect it'.

² See additional comments below in regard to the Northern Pegasus Bay Bylaw 2016.

5. Biodiversity and Biosecurity

Biodiversity

Council supports the focus on the biodiversity and biosecurity portfolio as a strategic priority for the Region and fully supports advancing practical actions from the LGNZ think piece [Addressing New Zealand's Biodiversity Challenge](#). In particular, ECan has a key regional role around (R1) 'the need for strong leadership and clarity of roles and responsibilities' (recommendation #1). In March 2018, the Regional Planning Managers Group resolved to engage key Central Government agencies towards developing a Canterbury response to the think piece, and have scheduled to dedicate their next meeting in July 2018 for this purpose.

It is important that the conservation and enhancement of indigenous biodiversity on private land are well articulated and founded in practical actions.

Biosecurity

While the Regional Pest Management Plan is not directly an LTP matter, Council supports the adoption of the plan, and looks forward to seeing tangible results in the management and control of pest species within our District including Russell lupin and wilding conifers.

6. Hazards Risk and Resilience

Climate Change Integration Programme

The Council applauds the establishment of the new programme of work, Climate Change Integration. Mitigation of and adaption to climate change need to go beyond business-as-usual approaches and alter approaches to dealing with the direct and indirect impacts of a changing climate system on the hydrological system, rural and urban land use, urban development, planning, the transport system, the energy system (including electricity networks), social structures and governance structures; and recognize the myriad of interdependencies between the systems.

The Government's response to climate change has been firmly signalled in its 100 Day Plan for Climate Change³

Furthermore, the Council notes the recent release of the new Parliamentary Commissioner for the Environment's (Simon Upton) report *A Zero Carbon Act for New Zealand*. While mitigation currently is a responsibility at a national level, local government will play an increasingly important role in relation to adaptation. In relation to local government, the Commissioner's report states:

'While the responsibility for adapting to climate change is at present largely devolved to local government in New Zealand, it will also need to be considered in national planning and investments. Adaptation will have an impact on decision-making at both central and local government level, as well as decision-making within communities, by iwi, businesses and

³ The [100 Day Plan for Climate Change](#) (dated 20.12.2017) prepared by Ministry for the Environment for the Office of the Minister for Climate Change.

individuals. Any approach to adapting to the impacts of climate change needs to be coordinated across these many actors'

There is need to act now to ensure resilient systems are in place in place for both mitigating emissions and adapting to the effects of climate change in Canterbury. Early action provides more time and options for the transition to a low-emissions economy. Additionally, fewer sunk costs are likely to occur in investments that do not aid the transition. This is important for smaller councils like Waimakariri which have to defend annual rate increases to fund new infrastructure.

The Council encourages ECan to demonstrate Regional leadership to lead the Canterbury response to climate change and work with this District and others to formulate and fund considered responses in the second and third year of the LTP, once it becomes clearer what the Zero Carbon Act will require of local government.

Energy

The production and end-use of energy (including electricity, heat, transportation fuels and biomass) is inextricably connected to climate change. With regard to energy, the Council notes in the LTP that energy management is largely limited to matters of energy efficiency and Regional Council responsibilities under the *Energy Efficiency and Conservation Act 2001*, broadly, insulating private dwellings for warmth and dryness to improve ambient air quality.

The Council requests that ECan consider widening its energy portfolio to work with stakeholders on the broader matters of energy security, reliability and affordability and to (re)examine a number of local opportunities for development of renewable energy resources.

As recently as 2009/10, ECan had an active energy portfolio. ECan, together with organisations which included the Canterbury Employers' Chamber of Commerce, Christchurch City Council, Transpower, Meridian Energy and Mainpower, developed a non-statutory Regional Energy Strategy, a strategy which at the time received strong endorsement from senior leaders and elected members and the support of central government to develop regional strategies of this nature.

The purpose of this strategy was to enhance the energy resilience of Canterbury, by ensuring a secure, reliable, affordable and sustainable energy system. It proposed three key directions that, when taken together, would keep options open (change in technology adoption and social responses), to ensure a diversity of energy sources and create an environment for innovation.

It is timely, given a LTP portfolio which includes 'resilience', for ECan's energy portfolio to be widened, utilising existing cross-boundary partnerships, e.g. the Resilient Greater Christchurch Plan, drawing upon funding streams which are being or have been established and are complementary to creating a resilient energy system.

The Government's Confidence and Supply Agreement notes that the Government will request the proposed Climate Change Commission to plan the transition to 100 per cent renewable electricity (the Renewable Electricity Target) by 2035. This may very likely be mandated by the Carbon Zero Act.

Similarly to climate change, the Council encourages ECan to demonstrate Regional leadership on energy, recommending firstly that the Region's districts, energy end-users and energy companies reinvestigate development in Year 1 of the LTP of a Regional Energy Strategy. Initially, this would derive a small rate burden but with the introduction of demonstration projects in Years 2/3, the strategy can become increasingly funded by external investors.

The Council also sees Environment Canterbury Councillors to be in a particularly influential position to engage with government agencies such as Energy Efficiency and Conservation Authority to bring about a nationally consistent local authority and energy provider approach to the development of local (individual or collective) renewable electricity generation systems.

Navigation Safety in the Kaiapoi and Lower Cam Rivers

The Council has received a number of requests since 2014 from Kaiapoi River users for improvement to specific areas of the Kaiapoi River 'navigation channel', including from the Coastguard. The Kaiapoi River Rehabilitation Working Party (the Working Party), following receipt of this feedback, commissioned a detailed study⁴ in which report authors recommended further investigation into an option of targeted dredging of high spots in the river bed to create a minimum depth navigation channel in the Kaiapoi River.

The report recommendations state 'a number of "high spots" exist in the channel, where depths are currently 1.0 – 1.5 m or less at low water and particular attention is required when navigating. Targeted dredging of these identified high spots could improve the safety of all vessels using the river, but particularly for Coastguard operations. This would also extend the tidal "window" for any deeper draught vessels that may in future use the Kaiapoi River' (Marico Marine 2016, p.7).

Furthermore 'the Coastguard representatives present for the scoping visit reported that they are currently able to use the river at all stages of the tide, albeit by navigating very carefully at low water. Having such minimal under-keel clearance is not ideal from a safety of navigation perspective, with the risk of grounding en-route to a rescue. Other river users currently restrict their passage to when the tide is higher, if limited by their vessels draught' (Marico Marine 2016, p.21).

The report also notes 'Coastguard reported their ideal operational depth would be a minimum of 1.5m water depth. This provides a small safety margin to prevent engine or propeller damage. The Coastguard need should be seen as a minimum, as to operate anything larger than a craft of the type used by Coastguard at present would be difficult' (Marico Marine, 2016, p.8).

Taking into account of the consultant's recommendations, the Council is now further investigating the potential targeted dredging of Kaiapoi River bed 'high points' and is in process of undertaking detailed dredging design and consent applications for the work, to lodge with ECan.

The Council would appreciate the support of ECan's Harbour Master and river engineering teams in determining technical aspects of the proposed navigation channel requirements. It will also be seeking technical advice and support to assist the Council with the resource consents and design process.

⁴ *Kaiapoi River Navigation Channel Concept Design*. Report prepared by an independent harbour management consultant, Marico Marine New Zealand Ltd. Published May 2016.

The Harbour Master is also asked to take a more proactive stance in assisting the Council to improve operating navigation safety in both the Kaiapoi and lower Cam Rivers. This should include assistance to remove temporary fishing structures where these impede navigation in the rivers, and in particular in areas where access of the Coastguard may be reduced.

Kaiapoi River Rehabilitation Project Funding

The Working Party requests ECan provide base ongoing funding of \$25,000 per annum as a cost share with the Waimakariri District Council to enable its prioritised projects to be progressed.

It is noted that the Working Party resolved at its most recent meeting on 25 October 2017 to ask *'that the Waimakariri District Council and Environment Canterbury each consider providing ongoing funding of \$25,000 per annum through their Long Term Plans to enable continued staged implementation of the Kaiapoi River Rehabilitation Project'*.

At this meeting, the Working Party the endorsed the concept option described in the Marico Marine report to *'dredge high spots in the river bed, which will improve safety at low tide for the Coastguard and other river users and recommends this option to the Waimakariri District Council and Environment Canterbury using available project funding in 2018/19 and 2019/20 as a priority project for implementation'*.

The actual funding for dredging the proposed minimum depth navigation channel is currently being confirmed and will depend on scoping of detailed design and selected dredging and spoil disposal methods. The Council is requesting a cost share from Environment Canterbury of at least \$25,000 per annum for this work in 2018/19 or 2019/20 (timing dependant on design and consenting inputs), in recognition of the public safety benefit of the proposed navigation channel.

Coastal Environment and Hazards

The Council has concerns about delay in the review of the Regional Coastal Environment Plan and suggests that an additional Level of Service, Measure and Target be incorporated in this Programme. The following wording is suggested:

Level of Service 6.X: Amend the Canterbury Coastal Environment Plan in accordance with the *Resource Management Act*.

Measure 6.X.1: The Canterbury Coastal Environment Plan is reviewed in Year 2 taking account of newly available coastal science data and information work.

Target 6.X.1: The Canterbury Regional Policy Statement is amended in accordance with statutory timeframes.

The Council would also like to see ECan adopt a more consistent approach to the management of coastal hazards for those districts, including Waimakariri, with coastlines. This would include documenting coastal processes, beach profiles, sea level rise and potential impacts of climate change. The Council sees strong merit with matching the work on coastal hazards with the complementary approaches being proposed in the Climate Change Integration programme, and that this is best coordinated at Regional level.

7. Transport and Urban Development

Transport

The Council supports steps being taken by ECan to better plan and invest in urban development and transport infrastructure and services. However, the Council expresses a level of dissatisfaction with the current bus services to and through Kaiapoi (routes B and 95) and wishes to have a dialogue with ECan on how the quality of these services may be improved.

The issue of the provision of services between the major urban centres in the District, rather than simply running these as part of the service between the District and Christchurch, is also an on-going concern. Council surveys of households living in recently completed dwellings in Rangiora and Kaiapoi have indicated that residents are concerned about the distances to their town centres and the absence of public transport.

The provision of services originating and terminating within the District is a complex issue, and as it stated in its 2015-25 LTP submission, one that the Council would welcome the opportunity to continue to explore with ECan staff. The Council suggests a 'joint needs analysis' be undertaken in the 2018/19 financial year to address issues such as the impact of development that has occurred since 2015: the growth in new retirement villages, projected areas available for development, and the current and future demographic characteristics of the District's population. These factors all impact on the demand for public transport services between, and within, the District's settlements.

The Carbon Zero Act, cited earlier in this submission, is due in 2019 and likely to require more direct action to be taken by regional councils to reduce transport sector greenhouse gas emissions. ECan also acknowledges (p.40 of the LTP Working Document) that it needs to be responsive to the pending Government Policy Statement on Land Transport 2018 which is likely to be more directive and require regional councils to consider options for increasing high-frequency bus routes, and the possible introduction of commuter rail between Christchurch and its satellite towns, including Rangiora and Kaiapoi.

This Council welcomes working with ECan on exploring the most effective and sustainable forms of commuter transportation options between the City and Waimakariri District. This includes contributing to the 2018 review of the Canterbury Regional Public Transport Plan.

While the 2014 Northern Commuter Rail Study showed for three key reasons that a commuter rail service between Rangiora and Christchurch was not viable in the short term, the Council remains committed to working with ECan on transport initiatives including the Greater Christchurch Future Public Transport Business Case, that is, what the public transport system might look like over the next 30 years.

The new Government has to that end committed an additional \$100m from the National Land Transport Fund in capital investment to Greater Christchurch multi-modal public transport, including commuter rail from Rolleston to the Christchurch CBD as a first step. It is important that all options for commuter rail are canvassed before committing to any particular solution.

The other major urban centres of Auckland and Wellington have each in recent years mounted cases for and achieved significant strategic investment in public passenger transport system upgrades. Public passenger transport in Greater Christchurch requires comparable strategic development consistent with its growth and development as a metropolitan area. Significant regional leadership is required to achieve this.

Urban Development

The Council welcomes the opportunity to work with ECan on the 3-yearly capacity assessment of land available for feasible development required under the National Policy Statement on Urban Development Capacity and any review of statutory documents such as the Canterbury Regional Policy Statement.

8. Air Quality

The Council welcomes the strategic focus on addressing air quality issues, especially around home heating. To that end, the Council supports the introduction of the 'Healthier Homes Canterbury' voluntary loan scheme and regards this as an important measure to assist Rangiora and Kaiapoi communities to live in a warmer and dryer home environment.

However, the Council still has concerns, and are the same concerns which it raised in its submission on the 2015/25 LTP, around the current National Environmental Standard for Air Quality (NESAQ) being used for particulate matter. The Council drew attention to the issue then of apparent anomalies associated with the NESAQ for PM₁₀ being based on exceedances rather than on annual averages in the submission to the Regional Council's 2015/25 Long-term Plan. This point is re-iterated in this submission.

The trend data for exceedances (drawn directly from ECan's air quality data) for Rangiora and Kaiapoi is shown in Figure 1.

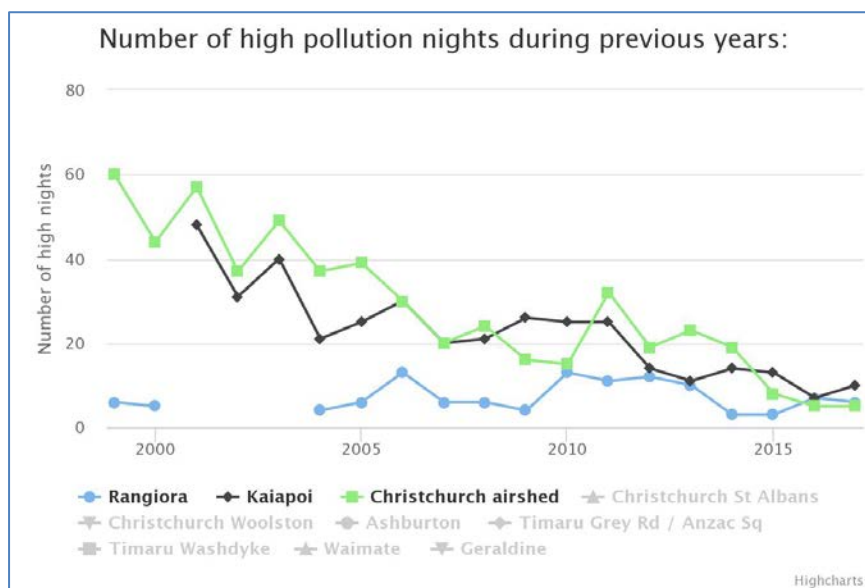


Figure 1 Annual exceedances in Rangiora and Kaiapoi and comparison with Christchurch airshed

While the number of high pollution nights exceeds the NESAQ, the Council contends the measure remains incorrect and gives the perception that winter ambient air quality in Rangiora and Kaiapoi

is worse than what it is in reality. This is particularly important for the Kaiapoi airshed where PM₁₀ exceedances are unhelpfully enhanced by a particulate loading bias of coastal sea spray particles.

The Council contends this remains a flawed measure of air quality in the District (and indeed, regionally and nationally) and that the annual average concentration of PM₁₀ is the correct measure as shown in Figure 2. This has been borne out in the 2014 report on air quality⁵ by the then Parliamentary Commissioner for the Environment, Dr Jan Wright. The points she made in that report in 2014 are still relevant in 2018. Four years on, the ECan trend data is showing that the air quality (in relation to PM₁₀) in Canterbury settlements continues to improve.

It is appreciated there are a handful of high pollution nights in our towns but the trend bears it out, even with an increasing population in Rangiora, that air quality is improving, chiefly via measure made in the Clean Heat and related programmes.

However, the World Health Organization (WHO) has four guidelines for particulate concentrations: two for PM₁₀ (one for short-term exposure and one for long-term exposure) and two guidelines for PM_{2.5}. WHO is clear that the long-term exposure guidelines are more important than the short-term exposure guidelines because the health impacts on the population are much greater over the longer term. WHO recommend that the annual average take precedence over the 24-hour average.⁶

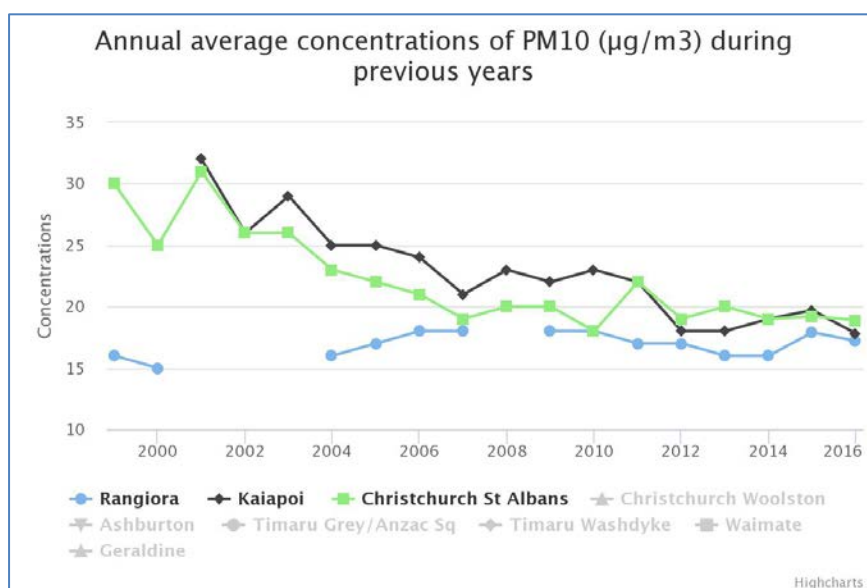


Figure 2 Annual average concentrations of PM₁₀ in Rangiora and Kaiapoi and comparison with Christchurch airshed

In reality, the seriousness of such exceedances on public health are spurious using the current NES measurement. It is easy to gain the impression that once a guideline level is crossed, the effect of particulates on people’s health suddenly becomes much greater. However, this is not the case as there is no threshold in the dose-response curve for long-term exposure to particulates.

The degree of the exceedances (the height of the winter spikes) is not reflected in the PM₁₀ rule. There is no distinction between an exceedance of 51 µg/m³ and an exceedance of 101 µg/m³. This reinforces the perception of a threshold.

⁵ *The state of air quality in New Zealand Commentary by the Parliamentary Commissioner for the Environment on the 2014 Air Domain Report* (released in March 2015).

⁶ *WHO air quality guidelines for particulate matter, ozone, nitrogen dioxide and sulfur dioxide: Global update 2005: Summary of risk assessment* (cited in Dr Wright’s 2015 report).

Dr Wright confirms this in her report, that is, *‘there is no “safe” level of air pollution, and air quality in New Zealand is generally good and likely to continue improving.’* She adds that *‘the policy goal should be to ensure progressive improvement, and a rule could be designed in such a way as to incentivise this.’*

In addition, it is now widely accepted among air quality scientists that PM_{2.5} concentrations are a better indicator of health impacts across the population than PM₁₀ concentrations. This is because the smaller particles are, the more damaging they are to human health⁷.

The Council sees Environment Canterbury Councillors in a particularly influential position to work with the Ministry for the Environment to review and amend the NESAQ for the measurement of PM₁₀, namely:

- amend the NESAQ for PM₁₀ to be in line with best management practice elsewhere in the world and with WHO guidelines
- to mandate as soon as is possible the NESAQ for PM_{2.5} in line with WHO recommendations and best international practice.

9. Other comments

Northern Pegasus Bay Bylaw 2016 Implementation Plan

In December 2017, the Council adopted the Northern Pegasus Bay Bylaw 2016 Implementation Plan (attached to this submission) which was developed by a joint working party chaired by (the late) Councillor Peter Allen and consisted of WDC and ECan staff, Community Board members and representatives from Te Ngāi Tūāhuriri Rūnanga, Te Kōhaka o Tūhaitara Trust, Department of Conservation and the Ashley-Rakahuri Rivercare Group. A coastal advisory group is currently in the process of being set up to oversee the implementation of the Plan.

Sealing of the Kairaki Beach car park (**action PS.6**) was identified as a priority project to be funded in a 50/50 arrangement by ECan and the Council. The Council has allocated \$80,000 in the 2019/20 financial year for this project and notes ECan has done the same.

The Council would like to reiterate its support for the continued inclusion in ECan’s LTP of \$80,000 in 2019/20 for sealing the car park at Kairaki Beach.

Kaiapoi River Channel Maintenance

The Council is asking Environment Canterbury to work with it to implement a proactive maintenance, amenity, recreation and enhancement programme for the Kaiapoi River through the centre of Kaiapoi. This should involve an agreed programme for the control of willows, noxious and rank weeds and provision of amenity and landscaping including, potentially, selected areas of planting and open spaces on the lower banks of the Kaiapoi River to the water’s edge, implemented through the full extent of the town centre.

The proactive management of maintenance and amenity of the river in the town centre is similar to that already provided within every other town centre in New Zealand, where landscaping,

⁷ WHO Air quality guidelines: Global update 2005: Particulate matter, ozone, nitrogen dioxide and sulfur dioxide (cited in Dr Wright’s 2015 report).

urban design, naturalised areas and streetscape are recognised in strategies and management approaches in every jurisdiction. Kaiapoi is unique to New Zealand in that there is a river within the heart of the town immediately adjoining boutique shops, entertainment and dining facilities and civic structures. This requires a unique new management approach that includes flood protection and river engineering inputs as well as landscaping and amenity.

The management of the river is integral to the tourism values and general function of the town centre. It will likely also influence the overall success of the town centre redevelopment.

A decision on roles and responsibilities for maintenance of the river through the town centre is now critical.

The Council, and in particular, the Kaiapoi-Tuahiwi Community Board also has concerns about the impact of Waimakariri River minimum flows on saltwater intrusion of the Kaiapoi River. It is important that the ECan science and monitoring budget is adequate to assess the cause and effects of these impacts conclusively. Now that the scientific data around the influence of the Waimakariri River on the Kaiapoi River is available, it is important that ECan takes into account what outcomes the community wants for the Kaiapoi River.

Enhanced linkage to the Waimakariri River Regional Park

There is an opportunity to enhance the linkages between the Silverstream Reserve and lower Silverstream through to the Kaiapoi River and town centre to the Kaiapoi Island to form a recreation and biodiversity 'corridor', thereby improving the connections with the Waimakariri River Regional Park.

This could be achieved through extending and connecting the existing separate amenity, recreation, landscaping and biodiversity projects along the margins of these waterways. The corridor would follow the path of the Kaiapoi River system beginning at the headwaters of the Silverstream near the Waimakariri River, creating a loop via the margins of these waterways to and along the Kaiapoi and Waimakariri Rivers back to the Silverstream source. These areas could be connected using existing land corridors including roads and stopbanks. This corridor would be formed and extended as a part of the ongoing development of the Waimakariri River Regional Park.

This extension would provide a valuable improvement to the management of the whole river system. It could logically be managed through an extension to this Regional Park work programme, as the Silverstream and downstream Kaiapoi River, prior to the early 1900's, lay within an active branch of the braided Waimakariri River floodplain and were originally a part of the braided Waimakariri River 'north branch'.

The Council now recommends the interconnection of remnants of the original braided channel with new biodiversity and recreational corridors, including extensions to the existing walking and cycling trails so that the values of the waterways and improvements made are more visible and accessible.

This proposal would sit within the budget envelope and scope of target 6.9.1 of the consultation document, which provides for a strategic review of parks and reserve land management in 2019/20.

The Council wishes to be heard in support of this submission. Thank you.

From: Geoff Meadows <geoff.meadows@wmk.govt.nz>
Sent: Tuesday, 27 February 2018 3:28 PM
To: Mailroom Mailbox
Cc: Mike O'Connell; Simon Markham
Subject: LTP Submission

The Waimakariri District Council would like to make a submission on Environment Canterbury's Long Term Plan 2018-2028, however to give the elected representatives of Council opportunity to approve the submission, an extension of the closing period to Tuesday 3 April 2018 is requested.

This provides opportunity for Councillors to approve the submission to Ecan, at the ordinary meeting of Council on 3 April 2018.

The Council would like to be heard in support of their submission.

Thank you in anticipation.

Regards

Geoff Meadows | Policy Manager

Policy and Strategy Unit

geoff.meadows@wmk.govt.nz

Customer Service: 0800 965 468 (0800WMKGOV)

Phone: 03 311 8902 | Ext: 8605

Mobile: 0213 103 43



waimakariri.govt.nz



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