

Make Submission

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Event Name	Long-Term Plan 2018-28 Consultation
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Whole Plan Support/Oppose	
Please select one of the following:	I generally agree with the activity proposed for the Long-Term Plan.

Whole Plan Comments

Please provide any comments.

Freshwater Management

As the manager of BRaid, braided river aid (www.braid.org.nz) I would like to acknowledge the goals and achievements to date of the Canterbury Water Management Strategy, and that it remains the highest of ECan's strategic priorities. I further acknowledge that this remains a complex and contentious issue and would like to extend my thanks to everyone who has been involved in this process to date.

I would like to see: a more 'user pays' approach to freshwater management including the following:

- 1 A target to be set for measuring economic externalities in terms of water quality and quantity
- 2 Economic externalities be removed so that clean water is regarded as, and factored into the cost of doing business
- 3 More random checks and monitoring for compliance
- 4 Significantly greater enforcement for non-compliance. I appreciate that this is onerous to some businesses, particularly to the rural sector, but the real costs should no longer be born by downstream users including the next generation
- 5 Targeted rates as an interim measure to finance monitoring and compliance

Biodiversity and Biosecurity

In recognition of their importance and value, braided rivers are the only ecosystem in the ten broadly targeted areas to have its own set of targets in the CWMS. One of the CWMS targets under 'Natural Character of Braided Rivers' is to implement actions to correct the decline in useable braided river bird habitat. I acknowledge the work being undertaken to enact these targets, including the current work to define the boundaries of braided rivers, ie, the recognition that braided rivers are not like incised rivers with clearly defined riparian margins. Braided rivers are globally rare ecosystems consisting of channels of water across a periodically dry braidplain that collectively supports a rich and complex biodiversity. Nevertheless, biodiversity funding needs more resourcing. Protecting the biodiversity in braided rivers should be a requirement, not an aspiration that must be compromised at the cost of short term and often private economic gains.

I would like to see:

- 1 Under the precautionary principal, any further encroachment of agricultural activities onto braided river margins be halted until such times as a clear definition of what constitutes the boundaries of braided rivers is determined for each river
- 2 More funding, not less, for biodiversity, including funding for warranted rangers
- 3 Greater enforcement for non-compliance, including under the Wildlife Act
- 4 Introduction of restricted permits for motorized vehicles using braided rivers. This is not intended to prevent commercial or recreational users. Rather it is to ensure all users are made aware of the sensitive environment they are entering and their obligations under the Wildlife Act. Permits could be issued in conjunction with commercial and recreational licenses such as gravel extraction, jetboating, fishing etc. or purchased through the same channels, the administration of which could be funded by the cost of the permits.

Hazards, Risk and Resilience

Perhaps the most challenging task facing the Council because climate change is a risk multiplier across all sectors. While I support the concept of climate change integration, **I would like to see:**

- 1 Greater resourcing for a more strategic and integrated approach to biodiversity, freshwater management, and hazards, risks, and resilience under a changing climate regime
- 2 Clear and unambiguous guidelines where the priorities for biodiversity, freshwater management, and hazards conflict. How will policies be interpreted and enacted when one appears to trump the other?

Example 1: The 2010 Coastal Policy Statement, Policy 3: Precautionary Approach 2 states that steps should be taken:

2(a), to ensure that, avoidable social and economic loss and harm to communities does not occur

2(b), natural adjustments for coastal processes, natural defences, ecosystems, habitat and species are allowed to occur

Will, for example, as a natural adjustment to rising sea levels, the Ashley River estuary and the extraordinarily diverse bird life it supports be allowed to migrate inland (natural adjustment), flooding critical infrastructure (economic loss and harm) such as SH1?

Example 2: Flood protection of the Waimakariri forces sediment that helped form the Canterbury Plains as well as floodwaters, out into Pegasus Bay rather than along the coastal margins. Preventing sediment from being delivered to the coastline as sea levels rise is like raising water levels in a bathtub without raising the edges of the tub. Compounded by more frequent storms, increased coastal erosion will, in effect, erode the edges of this real world 'bathtub', exacerbating the rate of seawater inundation. In this example, the priority to protect Christchurch against flooding from the Waimakariri River is likely to hasten flooding and ultimately permanent inundation by the sea along the Pegasus Bay coastline.

While soft and/or hard engineering actions can mitigate rising sea levels along the entire Canterbury coastline, there are economic and/or environmental costs. **I would like to see:**

- 1 **Adaptation:** ECan itself give priority to defining priorities across the district: under a changing climate, in cases where the protection of one resource or asset (such as biodiversity and natural

defenses such as lagoons and dune systems) may conflict with the protection of another assets and/or resource (critical infrastructure and/or private property), which takes priority?

- 2 **Mitigation:** ECan implement an environmental management plan to reduce its own greenhouse gas emissions across all activities.