

From: evanavon@outlook.com
To: [Hearings](#)
Cc: CSNDC@ccc.govt.nz
Subject: Notifications Consent Submission: Group 362
Date: Thursday, 30 August 2018 5:27:17 a.m.
Attachments: [AvON-Submission-on-Resource-Consent-Application-CRC-190445.docx](#)

Group ID: 362

Name: Avon-Otakaro Network

Care of: Evan Smith

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Contact by email: Yes

Is a trade competitor: No

Directly affected: Yes

Consent support/hearing details

- CRC190445: oppose | WANT to be heard | will NOT consider joint hearing

Reasons comment:

See attached submission

Consent comment:

See attached submission



Submission to Environment Canterbury

On behalf of Avon-Ōtakaro Network

On Resource Consent Application

CRC190445

of Christchurch City Council
to discharge from the comprehensive stormwater network

We wish to be heard

Primary Contact:
Evan Smith, Spokesperson, Avon-Ōtakaro Network
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We **OPPOSE** this application

AvON and our vision for the Ōtākaro Avon River corridor

Avon-Ōtākaro Network (AvON) was founded in 2011 to promote a popular vision for the future of the Ōtākaro Avon River corridor (OARC), including what was formerly known as the Avon River residential red zone.

Our vision is for:

- a multi-purpose river park from city-to-sea that meets a diverse range of community needs, and.
- the maximum possible restoration of native ecosystems to enhance water quality, biodiversity, mahinga kai values and resilience to natural hazards.

We are a network of organisations and individuals who in 2012 submitted a petition to Parliament in support of this vision signed by over eighteen and a half thousand people.

All engagement with the community since, including that recently by Regenerate Christchurch, has indicated that the level of support for this vision remains extremely high.

For more info: www.avon.org.nz

Reasons for our Opposition / Decisions Requested

1. We do not accept that “overall potential adverse effects on the receiving environment will be minor.” The erroneous basis of this assessment is its reference to the existing environment into which the stormwater will be discharged, which the applicant freely admits for the most part is already very significantly degraded because of the cumulative effects of decades of such discharge. The reference point for any test of adverse effects on the receiving environment must be its indigenous state not its current state. **In which case it is very evident that the adverse effects will most definitely NOT be minor, and the consent should thus be declined.**
2. With the inclusion of a considerable number of individual consents into the comprehensive consent, there is need for the applicant to define what powers it would invoke existing or new, by way of bylaw or other instrument, to enforce compliance where necessary. **More reassurance re proposed compliance enforcement mechanisms are needed from the applicant.**

3. Throughout the application there is reference to 'stakeholders' such as iwi, Zone Committee and Community Boards, but nowhere is community in general, or waterway care groups in particular, identified as key stakeholders. **There needs to be recognition of waterway care groups as key stakeholders regarding SMP reviews, annual EMP updates and annual reviews of the consent, in a manner similar to the annual Compliance and Monitoring Liaison Group updates invoked for the Waste Water Discharge consent.**
4. Contaminant modelling of TSS in the Ōpāwaho is based on Auckland data which uses clay soils not loess-based soils – the applicant needs to better calibrate the model for Christchurch conditions. **More work is needed to improve accuracy of model based on Chch conditions.**
5. We endorse the use of 'non-infrastructural' measures such as:
 - Advocacy for Central Government legislative intervention in outlawing copper in brake pads, zinc in tyres and adoption of national measures and industry standards to reduce the discharge of contaminants including zinc and copper from metal roofs
 - Advocacy for research into light weight roofing materials that are contaminant-free
 - Adoption of education and behaviour change initiatives to reduce household contaminants at source eg via the Community Water Partnership.

These must be measurable and enforceable as conditions to any consent to ensure they are adequately resourced (including the resourcing of community partners in this).

6. It is acknowledged by the applicant that every effort must be made to use every opportunity to retrofit remediation measures in established residential areas wherever possible. The applicant has not identified the potential of the Ōtākaro Avon River Corridor regeneration zone to do this, particularly where the contaminant load in the receiving environment has been identified as particularly high eg at the Horseshoe lake outfall. **As a condition of any consent the applicant must identify Horseshoe Lake red zone as an area of exceptional value for stormwater remediation and as such be prioritised for this above all other future land uses.**

Signature: 

Date: 22 August 2018