

From: evanavon@outlook.com
To: [Hearings](#)
Cc: CSNDC@ccc.govt.nz
Subject: HPE CM: Notifications Consent Submission: Group 362
Date: Thursday, 30 August 2018 2:40:06 p.m.
Attachments: [Combined-Submission-on-Resource-Consent-Application-CRC-190445.docx](#)

Group ID: 362

Name: Combined River Care Networks (Avon-Otakaro Network, Opawaho-Heathcote River Network, Cashmere Stream Care Group, Avon-Heathcote Estuary Ihutai Trust, Travis Wetland Trust)

Care of: Evan Smith

Mailing address 1: 9 Stable Way

Mailing address 2:

Suburb: Belfast

Town/City: Christchurch

Post-code: 8051

Country:

Mobile phone: 0297399796

Work phone:

Home phone:

Email: evanavon@outlook.com

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:

Please refer attached Submission

Consent comment:

Please refer attached Submission

**Resource Consent Application of Christchurch City Council
to discharge from the comprehensive stormwater network**

CRC190445

Submission to Environment Canterbury

by

Combined River Care Networks

Ōpāwaho-Heathcote River Network

Cashmere Stream Care Group

Avon-Ōtākaro Network

Avon-Heathcote Estuary Trust

Primary Contact for service:
Evan Smith, On behalf of Combined River Care Networks
9 Stable Way, Belfast Christchurch 8051
029 739 9796
evanavon@outlook.com

We wish to be heard

The Combined River Care Networks

The Combined River Care Networks embrace much of the two main urban river catchments of Christchurch City including the estuary/Ihutai.

Collectively we undertake the annual Mother of All Clean Ups to remove litter from our waterways, promote greater public awareness of the need to look after their health, and undertake monitoring, research and riparian ecological restoration projects. To this end we are working with agencies, iwi and universities to develop the Community Water Partnership. The Partnership aims to facilitate behaviour change in communities to limit contaminants entering the stormwater at source.

We **OPPOSE** this application

Reasons for our Opposition

1. The applicant ascertains that “overall potential adverse effects on the receiving environment will be minor.” We do not accept this assessment. It is based on the current already significantly degraded condition of the receiving environment. If any test of adverse effects on the receiving environment is to be meaningful, the reference point must be the original native condition of the waterways, not their current contaminated state.

In our view the applicant is only committing to the bare minimum to meet its commitment to limit contaminant load in the waterways and may not even meet its target of slight improvement.

Decision Requested:

Much more stringent conditions and targets are imposed to establish a very clear trajectory and timeframe for reduction in contaminant loads in all catchments within this generation to the extent that they are swimmable and can safely support mahinga kai values. Without these conditions and targets the application should be declined.

2. The applicant makes reference to ‘stakeholders’ such as iwi, Zone Committee and Community Boards, but does not include community in general. River Care Networks, such as ourselves, have a vested interest in SMP reviews, EMP updates and reviews of this consent.

Decision Requested:

Community River Care Networks must be identified as key stakeholders with regard to any consent and be included in an annual review group process similar to the Compliance and Monitoring Liaison Group invoked for the Waste Water Discharge consent.

3. 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 lightweight 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.

Decision Requested:

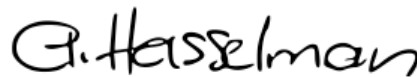
Measurable and enforceable conditions to any consent to ensure such actions are undertaken and adequately resourced (including the resourcing of community partners in this where appropriate).

Signed:



Evan Smith
Avon-Ōtākaro Network

Date: 27 August 2018



Annabelle Hasselman
Ōpāwaho Heathcote River Network

Date: 27 August 2018



Kit Doudney
Avon-Heathcote Estuary Ihutai Trust

Date: 30 August 2018



Ken Rouse
Cashmere Stream Care Group

Date: 27 August 2018

A handwritten signature in black ink, appearing to read 'Colin Meurk'. The signature is fluid and cursive, with the first letter 'C' being particularly large and stylized.

Colin Meurk
Travis Wetland Natural Heritage Trust

Date: 30 August 2018