

From: evanavon@outlook.com
To: [Hearings](#)
Cc: CSNDC@ccc.govt.nz
Subject: Notifications Consent Submission: Group 362
Date: Thursday, 30 August 2018 2:34:51 p.m.
Attachments: [Joint-Submission-on-Resource-Consent-Application-CRC-190445.docx](#)

Group ID: 362

Name: Joint Submission: Avon-Otakaro Network, Avon-Otakaro Forest Park, Greening the Red Zone, Travis Wetland Trust

Care of: Evan Smith

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Mailing address 2:

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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:

Refer to attached Submission

Consent comment:

Refer to attached Submission



Joint Submission to Environment Canterbury

**On behalf of Avon-Ōtākaro Forest Park, Avon-Ōtākaro Network,
Greening the Red Zone and Travis Wetland Trust**

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-Ōtākaro Network
9 Stable Way, Belfast Christchurch 8051
029 739 9796
evanavon@outlook.com

We **OPPOSE** this application

Our Shared Vision

We each share a similar vision for the Ōtākaro Avon River Corridor (OARC): to make the most of the current opportunity to return the corridor to its natural indigenous ecology as far as is possible, including restoration of biodiversity, river health, mahinga kai values and resilience from hazard.

Reasons for our Opposition / Decisions Requested

1. We do not accept that “overall potential adverse effects on the receiving environment will be minor.” This assessment 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.

Much more stringent conditions and targets must be imposed to establish a very clear trajectory and timeframe for reduction in contaminant loads entering the Ōtākaro and its tributaries 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. We note the high contaminant loads entering the Ōtākaro particularly from the Waikakariki/Horeshoe Lake outflow identified in the application. We also note the difficulty in retro-fitting stormwater remediation measures in established residential areas and the need to make the most of any potential to do so as result of land becoming available. The applicant has not identified the potential of the Ōtākaro Avon River Corridor (OARC) 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. Neither has the applicant recognised the OARC Regeneration Plan which is currently being drafted and will offer significant opportunities for stormwater and flood mitigation measures throughout the corridor.

As a condition of any consent the applicant must recognise the OARC Regeneration Plan as a relevant future planning instrument for consideration and identify the potential of the OARC, and Horseshoe Lake red zone in

particular, as an area of exceptional value for stormwater remediation and as such be prioritised for this above all other future land uses.

Signed:



Evan Smith
Avon-Ōtākaro Network

Date: 22 August 2018



Denise Ford
Avon-Ōtākaro Forest Park

Date: 30 August 2018



Tanya Didham
Greening the Red Zone

Date: 28 August 2018



Colin Meurk
Travis Wetland Natural Heritage Trust

Date: 30 August 2018