

**Submission on the Christchurch City
Council Comprehensive Stormwater
Network Discharge Consent
CRC190445
November 9th 2018**



Ōpāwaho Heathcote River Network Inc

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Appendix : The powerpoint presentation is part of the submission

1.0 The Ōpāwaho Heathcote River Network Inc (OHRN)

1.1 The OHRN is a community-led catchment group that is the voice for the River and the communities that live along it. It was developed as a response to the lack of integration in the management of the Ōpāwaho Heathcote River (Slide 2).

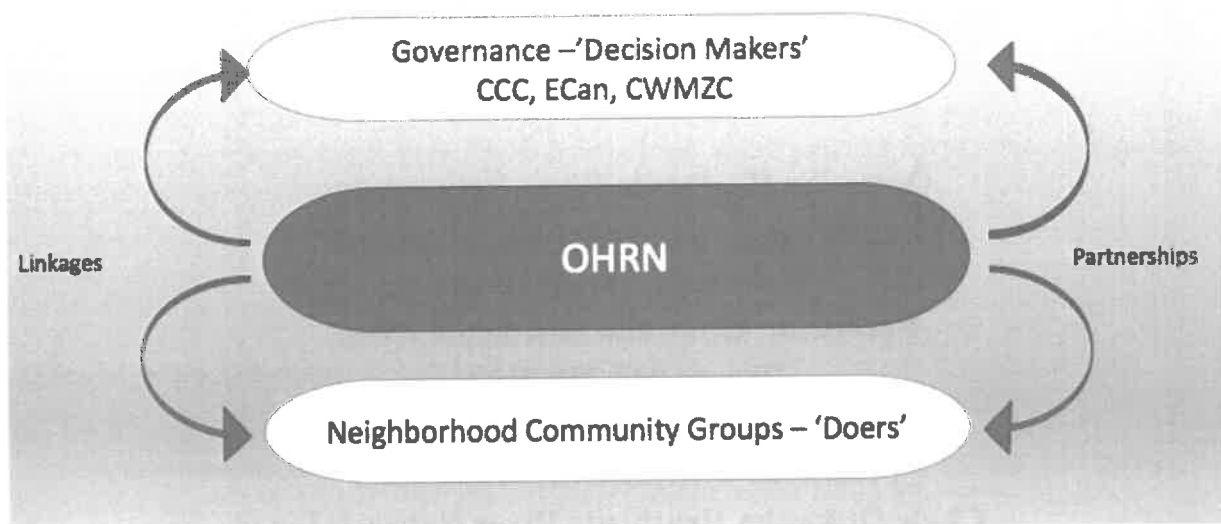
1.2 Our Vision is;
'An ecologically healthy river that people take pride in, care for and enjoy.'

1.3 Our Purpose is;
'To facilitate a collaborative Network which advocates for the regeneration of the whole of the Ōpāwaho Heathcote River.'

1.4 We operate collaboratively with Governance Agencies, who are the decision makers at one level, and community groups, or the doers along the river, at the other level (Slide 4).

1.5 There are nine community groups operating along the river (Slide 5).

OHRN Collaborative Approach



Slide 4. OHRN Collaborative approach

2.0 Activities of the OHRN (Slides 6-13)

2.1 The OHRN is involved in a range of projects in its role as a Community Catchment Group and in accordance with its Strategic Plan. These include;

2.1.1 The Annual Mother of All Cleanups in collaboration with the Avon Heathcote - Estuary Ihutai Trust and the Ōtākaro Avon Network (Slide 7).

2.1.2 Stormwater Education - Backyards Beside the OHR Clean Up (Slide 8).

2.1.3 Community Group Education And Awareness Programmes (Slide 9).

2.1.4 Collaborative Stormwater Education Projects with EOS Ecology, ECan, Roimata Food Commons and OHRN for Bamford and Thorrington Schools - '*Creating Ecosystem Health through Community Guardianship*' (Slide 9)

2.1.5 Collaborative Restoration and Education Project with EOS Ecology, CCC, St Annes School, Steam Wharf Community, Avon Ihutai Estuary Trust and OHRN - *Nature Agents Project*.

2.1.6 Stormwater Super Heroes Trailer. We are having input into the ECan lead project for the development and design of a Stormwater Super Heroes Trailer with Local Bodies and other Community River Care Groups. This resource will be used by community groups to raise awareness, provide information and understanding of how people can take action and change their behaviours to reduce the contaminants entering our rivers via the stormwater network.

2.1.7 River Awareness - World Rivers Day Photo Competition - '*A Day in the Life of the Ōpāwaho Heathcote River*' (Slide 10).

2.1.8 Community Group Restoration Projects along the catchments including Cashmere Stream Care Group, Ashgrove Terrace, Ernle Clark Reserve, the Donkey Track, Farnley Reserve, King George V Reserve, Laura Kent Reserve, Roimata Food Commons and Calder Green Reserve (Slide 11)

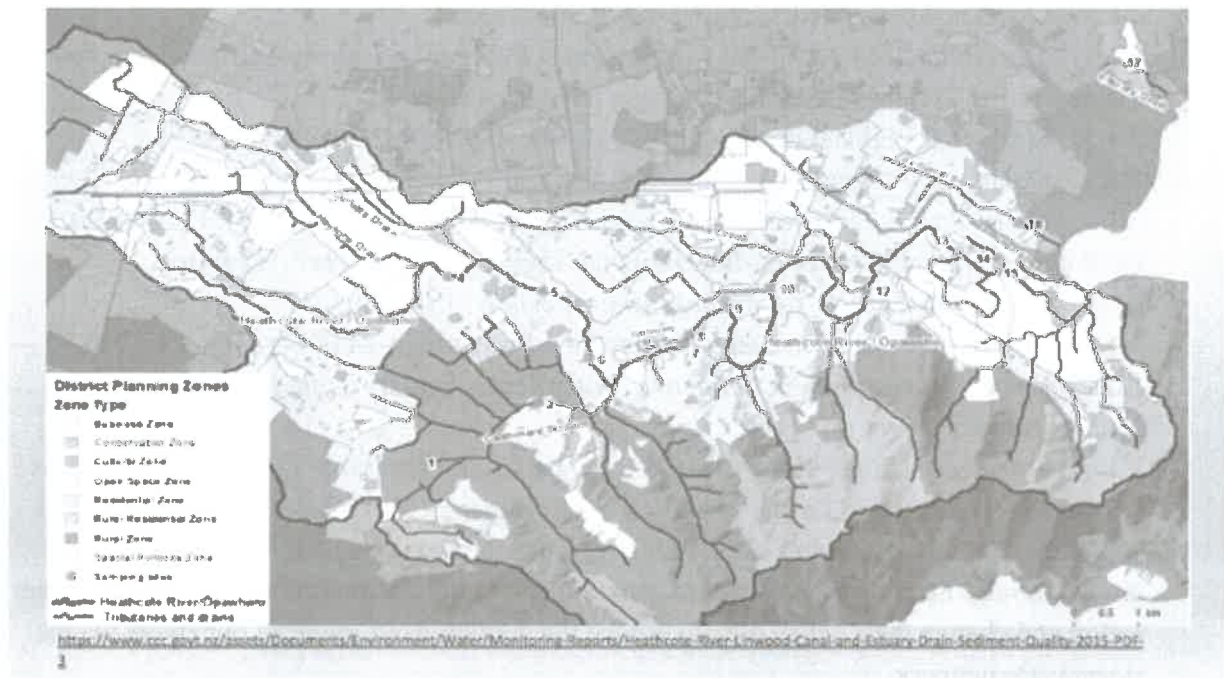
2.1.8 Consultation on CCC projects within the Catchment (Slide 12).

2.1.8 Statutory Advocacy for the Ōpāwaho Heathcote River (Slide 13).

3.0 The Ōpāwaho Heathcote River (OHR)

3.1 The Ōpāwaho Heathcote River, originates from a series of springs in the upper catchment and flows to the sea via the Avon - Heathcote Estuary (See Slide 14). Tributaries from the Port Hills also flow in to the middle reaches of the River. It is distinguished by its network of tributaries and the range of land-uses in the catchment. These include large industrial areas at the Haytons and Curletts Basins, concentrated urban and residential zones as well as rural and conservation areas (See Slide 15).

OH River Catchment & Land Use



Slide 15. The Ōpāwaho Heathcote River Catchment and the variety of land uses within it.

3.2 Like many lowland rivers, the Ōpāwaho Heathcote River suffers from ‘urban stream syndrome.’ It has the poorest water quality in the City of Christchurch (CCC, 2018) (See Slide 16). This is an indicator of the cumulative effects of activities and water management within its catchment over the last 150 years, including stormwater discharges contaminated by copper, zinc and sediment. This has resulted in a low baseline of ecological, water and sediment quality, and cultural health. The erosional profile of the Port Hills, which was exacerbated by the fires, and the landscape changes of the earthquakes have compounded these impacts (See Slide 16).

3.3 For these reasons the Network is seeking, by means of this consent, a very significant reduction in contaminants being discharged from the City’s stormwater system into the Ōpāwaho Heathcote River.

4.0 Conditions of the CCC Global Stormwater Consent

4.0.1. The OHRN notes the revised consent conditions as provided on Monday 5th November. These changes are a result of the S42A report, the submissions received and the agreement between CCC and Papatipu Rūnanga.

4.0.2. The OHRN is pleased to see that the Christchurch City Council has developed a model of commitment to the progressive improvement of stormwater discharges to its network including all rivers and their tributaries. We acknowledge that to achieve this there has been, and will continue to be, a substantial commitment of resources, staff and time.

4.0.3 The OHRN wishes to identify seven outstanding issues for the Commissioners to address. For the remainder it has confidence that the Panel will deal with these appropriately to enable the improved health of the Ōpāwaho Heathcote River.

4.1 Definition of the CCC Stormwater Network including Rivers

4.1.1 The OHRN has concerns that the definition in the consent for the CCC's Stormwater Network as including the rivers and their tributaries, could reduce ECan's powers to prosecute polluters of the the river, including its spring source. The inclusion of rivers from their source in the Stormwater Network, may mean these springheads are at risk of contamination. Could a polluter of the river not argue they are discharging into the Councils Network and therefore cannot be prosecuted by ECan?

4.1.2 We note that the applicant advised the Panel that this is the first time this definition has been used in New Zealand. We also note there has been no legal advice provided to the hearing on this point. We ask the Panel to ensure there are no hidden downsides for the environment in this unique proposal.

4.2 Certainty

4.2.1 Despite the Council's commitment to progressive improvement in contaminant levels, we are still seeking certainty that these improvements are locked into the resource consent conditions. This will ensure they are implemented and mechanisms are developed, to enable the ongoing reduction in the levels of contaminants entering the Ōpāwaho Heathcote River.

4.2.2 Water Quality and Quantity Standards- Conditions 20-24

We note the changes to Conditions 20-24 for the consent holder to use 'reasonably practicable measures' to strive to achieve the outcomes in the schedules attached to the consent. It is still unclear what these improvements will achieve.

4.2.3 Engagement with Papatipu Rūnanga

We welcome and support the additional changes achieved by papatipu rūnanga for the long-term benefit of the water quality and quantity of the river. These include Conditions 12(a) & 12(d) which ensures thorough engagement with papatipu rūnanga under condition 15(a)-15(d) and Condition 7 for the development of draft SMP's and Implementation Plans, and their availability.

4.2.4 Christchurch City Council and Regional Council Working Relationship

The success of this consent is reliant on the collaboration of the Christchurch City Council and Regional Council. The OHRN would like specific mechanisms within the consent conditions that ensures the implementation of measures are not jeopardized by a lack of political will or disagreements between the councils at any stage.

4.3 High Risk Sites to be Transferred to the Council

4.3.1 The OHRN supports the evidence from Mr Norton which seeks to establish a tighter regime for these sites. We still have concerns about the environmental risks to the river surrounding the control of these sites due to the limited powers of the Council to manage them under the By-Laws.

4.3.2 The OHRN again seeks certainty that the CCC has adequate powers of enforcement for breaches of its consent, before these sites are transferred. We have a high proportion of these feeding into the Ōpāwaho Heathcote River, particularly from the highly polluted Haytons and Curletts Stream catchments.

4.4 Access to Reports - Condition 52

4.4.1 The OHRN asks for access to reports being created under these conditions in a timely fashion.

4.5 Communication, Education and Awareness - Condition 38

4.5.1 The OHRN already has several programmes on communication, education and awareness. We look forward to continuing our relationship working cooperatively with both the Christchurch City Council and ECan. Mr Harris advised the Panel that it was '*cheaper keeping the contaminants out of the stormwater network than removing them once in.*' This underlines the importance of these programmes.

4.5.2 We seek a commitment from the CCC for sufficient resources to support the measures outlined in Table 9, as well as the development and implementation of a Community Water Partnership. This resourcing will enable a wide dissemination of information and provide support for volunteer community groups to actively participate in the behaviour change programme.

4.5.2 It also seeks a commitment to the continued funding of the Enviroschools Programme.

4.6 Non Infrastructure Measures - Condition 6

4.6.1 Mr. Norton has identified that individual site-scale measures such as rain tanks, rain gardens and permeable paving are part of the tool box to be employed in SMP's, but he identified some application problems to the Panel of these individual site measures.

4.6.2 Despite this, there is growing public support for people to take personal actions to help improve the health of their local river.

4.6.2 The OHRN wishes the Council to provide greater incentives for these measures.

4.7 Ōpāwaho Heathcote Stormwater Management Plan - Condition 7

4.7.1 The OHRN's specific interest is the forthcoming Ōpāwaho Heathcote River SMP.

- The timetable for the referral to ECan of the proposed Ōpāwaho Heathcote SMP is June 2019.
- The Panel has been advised that a draft plan has been developed.
- The OHRN has not seen this draft nor has it been consulted.
- The OHRN is concerned that the time available, until June 2019, is very short. This is of particular concern as two additional steps have been added in the conditions - Papatipu Rūnanga consultation and a Technical Review.

- Mr. Adamson's evidence also states that the:

'Sub Regional Plans will feed into the SMP's including stakeholder submissions.'

- The OHRN notes that in the legal submission of Mr. Pizzey and in the evidence of Mr. Adamson, the Council does not consider it necessary to include River Care Catchment Groups, such as the OHRN, in the development and review of SMP's. They consider consultation with the Christchurch West Melton Zone Committee (CWMZC) and Community Boards to be sufficient. They suggest that there is an existing process in place to deal with this consultation. Paragraph 74 of Mr. Adamson's evidence states:

'A framework with interaction of the community for the development of SMP's is already developed with CWMZC and Community Boards.'

4.7.2 The OHRN strongly disagrees with this for the following reasons;

- The Christchurch West Melton Sub-Regional Plan, which the Ōpāwaho Heathcote River is a part of, has not been developed to date.
- We believe the Zone Committee will not be able to organize an effective consultation and discussion with community groups within the timeframe proposed.
- The Ōpāwaho Heathcote River has three Community Boards along its length. These Boards are multi-functional and do not have expertise in water quality and water management issues, nor a catchment-wide approach.
- The Papatipu Rūnanga approach of requiring early consultation in the conditions is the approach we favor in developing the plan.
- We would suggest that the Panel asks for a timeline for the SMP process and requests a copy of the draft. We would ask the Panel, if appropriate, to change the deadline, to provide adequate time for effective public involvement.

4.7.3 The Ōpāwaho Heathcote River SMP is crucial to the environmental outcomes of the river. Many of the environmental measures discussed in this hearing, including sediment input and limits, on-site source mitigation, retrofitting, and SUDs are not covered by the conditions of this consent. They will be included within the Ōpāwaho Heathcote River SMP.

4.7.4 The OHRN would like to emphasize the substantial contribution put into this consent that is volunteer based within our Committee. Our volunteer hours for the past twelve months amount to the equivalent of 3-4 full-time employee hours. These hours have concentrated on the implementation of our annual work plan, which is focused around improving the quality of the


Ōpāwaho Heathcote River. As an NGO and a catchment-wide River Care group we should be identified as a key stakeholder in this process.

4.7.5 We request consultation on the Ōpāwaho Heathcote River SMP to address these catchment specific aspects. The OHRN wishes an early and ongoing consultation process in the development of the Ōpāwaho Heathcote River SMP.

4.7.6 We seek this to be written as a condition of this consent.

Thank you for the opportunity to submit to the Panel.


Annabelle Hasselman
Chair
Ōpāwaho Heathcote River Network



Opawaho Heathcote River Network Evidence for the CCC Global Stormwater Consent Hearing

November 9th 2018

The Opawaho Heathcote River Network (OHRN)² Developed as..

- A community response to the lack of integration in the management of Opawaho Heathcote river
- 2015-2016 development of the OHRN 
- 2017 OHRN Incorporated Society
- 2018 Charity Status & funding from the Rata Foundation

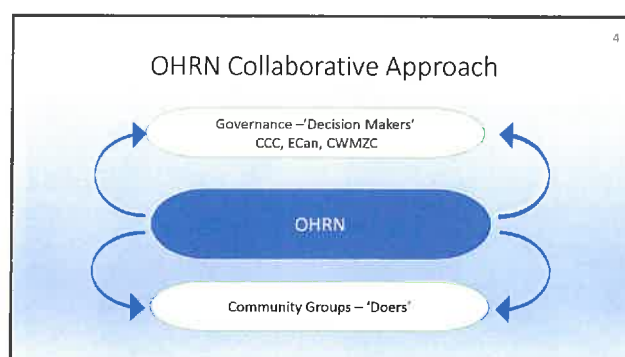
Vision & Purpose of OHRN

Vision:

- An ecologically healthy river that people take pride in, care for and enjoy.

Purpose:

- To facilitate a collaborative Network which advocates for the regeneration of the whole of the Opawaho Heathcote River"



9 Community Groups Active Along the River

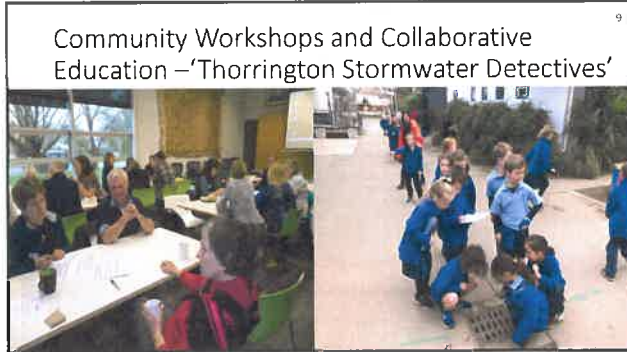
Opawaho/Heathcote River Network
These groups are all part of the Opawaho/Heathcote River Network & work side by side to improve the river.

OHRN Strategic Plan 2018- 2023

- Develop Strategic Overview
- Grow the OHRN
- Increase Visibility and Influence
- Work to Improve Water Quality
- Education on Catchment Wide Issues
- Links to Community Groups
- Improve Biodiversity
- Ngai Tahu Partnership




https://www.govt.nz/assets/Uploads/Opawaho-Heathcote-River-Consent-Work-and-Values.pdf




Advocacy for the Ōpāwaho Heathcote River 12

Submission on Christchurch City Council Draft Long Term Plan
April 2018




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Submission on the Christchurch City Council Comprehensive Stormwater Network Discharge Consent
CRC190445
August 2014



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Submission on Canterbury Living Water Plan
March 2016



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