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Date: Monday, 16 September 2019 8:07:27 AM
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Charlie

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Enquiry type *	Plan/rules
Provide detail of your enquiry here *	Plan Change 7
Attach a File	
Name *	Kaiapoi Promotions Association
Your contact phone number. We will call you during working hours if we need more information. *	+6421548751
Your email address *	chairperson@kaiapoi.org.nz



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13 September 2019

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Submission to Environment Canterbury Plan Change 7

The Kaiapoi Promotion Association Inc (KPA) welcomes the opportunity to make this submission to Environment Canterbury regarding Plan Change 7.

Clause 8.4.38 b) proposes consent reviews for minimum flows/allocations for the Northern Waimakariri River Tributaries proposed to be completed by 31 December 2029

Remedy Sought: The KPA requests this consent review process is advanced with urgency to be within 2 years of PC7 becoming operative.

The Kaiapoi/Silverstream river is the most polluted in North Canterbury with nitrate levels over the National Policy Statement - Fresh Water 6.9mg/litre bottom line, e.coli levels which regularly breach the 550/100ml level for contact recreation and the regular occurrence of nutrient-enriched algal blooms. This ecological degradation demands an urgent increase to the minimum flows to help rehabilitation of the long-compromised aquatic ecosystem in the Kaiapoi River and its tributaries.

ECan identified the low minimum flows in the Kaiapoi River and its tributaries as an issue affecting the viability of its fish and aquatic life as far back in 2001 (refer Appendix A1), and subsequent reports (refer Appendix A2 and A3).

Tributary flows are very important in flushing out the nutrient-rich and poor quality fresh water that overlies either saline or Waimakariri water which sits on the (Kaiapoi) river surface. The problem being that this nutrient-rich tributary water will slosh backwards and forwards through Kaiapoi for several tidal cycles before finally exiting to the Waimakariri and the sea. During this time it has ample opportunity especially during the summer months to grow smelly and / or form unsightly algal blooms and scums.

In addition, the safety of the public using the lower Kaiapoi River in the middle of Kaiapoi is of concern. The river hosts extensive rowing, kayaking and canoeing activities plus is a regularly used bathing spot during the height of summer yet the water invariably breaches the trigger levels for contact recreation and rarely meets bathing water standards.

It is unacceptable to KPA that ECan proposes to wait another decade until 2029 to address this issue.

If these flows are not raised for the Kaiapoi/Silverstream, Cust Main Drain, Ohoka, Cam and brook rivers, the lower Kaiapoi will be subjected to stinking sea lettuce growth, toxic algal blooms, scums and the progressive death of all the salt-sensitive riverbank vegetation.

The Waimakariri District Council and private business have invested tens of million to date in Kaiapoi Town centre redevelopment since the 2010-11 earthquakes. Encouraging new business, increasing the vibrancy of the town and encouraging more visitors is a key objective of the Kaiapoi Town Centre Plan, and a key plank of the Kaiapoi Promotion Association “Kaiapoi Brand” development programme. The prime focus of these plans is the engagement and enjoyment of the Kaiapoi River with a new \$10 million marine precinct, wharf and floating pontoons plus a riverbank walkway and terraces inviting locals and visitors to linger and relax at the water’s edge.

By increasing the river flows we go some way to ensure the restoration of some ecological health to our much-degraded river which will in turn enhance the town and the Waimakariri District and ensure the viability of business growth and that Kaiapoi lives up to its name as an attractive river town for locals and visitors to live in and enjoy.

To achieve this the Board **urgently requests** that Environment Canterbury advance the date for the Lower Waimakariri tributaries’ minimum flows and allocation consent review, by recalling and reviewing all the consents pertaining to the Waimakariri tributaries at the operative date of PC7.

This is critical to bringing life back into the Kaiapoi River and its tributaries. The Board requests this review, which involves a total of 187 stream-depleting and surface water abstractions, be started straight after the plan change becomes operative and be in place within two years from the date PC7 becomes operative.

This will enable the revitalisation of Kaiapoi town to continue, the rehabilitation of our rivers to progress and will go some way to mitigate the ecological damage which has blighted the Kaiapoi River system for many years.

The KPA wishes to be heard in relation to this submission.

Appendix A: Extract from past reports

1 ECan report U01/100, November 2001

“a minimum flow of 900 litres per second in the Kaiapoi River was necessary for protection of salmon passage, while the generalised relationship between flow and habitat derived from this study indicates that a minimum flow of 1,000 litres per second would adequately protect habitat for adult brown trout, large eels and other native fish.”

2 ECan report 07813138, Golder Associates, Minimum Flows and Aquatic Ecological Values of Lower Waimakariri River tributaries, June 2009).

“The existing minimum flow of 600 litres per second is considered too low for the protection of the key species identified in the Kaiapoi River”

3 ECan report No R18/7, Assessment of the state of a tidal waterway – the Lower Kaiapoi River, Adrian Meredith, March 2018

“The raised minimum flows by their sheer volume will also help mitigate the increased salt intrusion from the Waimakariri River, itself suffering from too low a minimum flow, although it is acknowledged that the combined tributaries’ effect is minor compared to an increased minimum flow in the Waimakariri”