

From: [Hayley Guglietta](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7
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Attachments:

Please find our submission attached

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Richmond Residents and Business Association (RR&BA) - Plan Change 2 & Plan Change 7

12/09/19

Whilst these plan changes are a step in the right direction the RR&BA do not feel that they go far enough to protect the Ōtākaro Avon River and its ecology from the impact of nitrates on its overall health and mahinga kai values, nor does it protect human health and wellbeing of the surrounding communities which rely on these mahinga kai values. We request that freshwater outcomes be set at a stronger level which meets social, cultural and environmental/ecological values.

- We **strongly endorse** the Christchurch City Council's submission on PC7 and PC2 as it goes into a much greater level of detail than we are able to.
- We **strongly request** all minimum flows and associated partial restrictions are set at a level to provide for the ecological health of the stream, river, hapua (lagoons), etc. within the life of this current plan. This may require a review of all current consents.
- We **strongly support** the caps on any new water allocation to help protect aquifers, shallow groundwater and the spring fed streams such as the Ōtākaro Avon River. For E. coli levels for urban waterways the level of 1200 puts the 95th percentile value in the 'D' category of the current National Policy Statement for Freshwater Management. This should be reduced from 800 rather than 1200.
- We **strongly support** greater recognition of mahinga kai values and the protection of sites of significance to Ngāi Tahu, including wāhi tapu (sacred sites), wāhi taonga (treasured sites), tuhituhi o neherā (limestone rock art sites) and waipuna (springs).
- We **strongly support** the introduction of additional protection for indigenous freshwater species and their habitat.
- We **strongly support** the introduction of additional structures enabling safe passage of indigenous freshwater species.
- We **strongly support** a science-based precautionary approach to the protection of Canterbury urban waterways such as the Ōtākaro Avon River, which rely on functional, healthy aquifer ecosystems. It is clear that further to being inconsistent with policies 4.4 and 4.5, the proposed nitrate limit of 3.8

mg/l will not provide for the ecosystem health of the Christchurch aquifers. We consider that the aquifer ecosystem which the Ōtākaro Avon River ecosystem relies on requires specific protection, greater than that is afforded in the current plans rules for nitrate reductions.

While we support the intent of nitrate reductions, we **strongly oppose** the current targets and timeframes as they are not ambitious enough, nor timely enough to protect social, cultural and environmental/ecological values of our aquifers, groundwater and waterways which rely on them such as the Ōtākaro Avon River.

- Water quality targets set in the Rivers, Lakes and Groundwater tables are too high. We **strongly oppose** the targets set under Schedule 8 and recommend thresholds are lowered in line with up to date research on the effects of water quality attributes on human health and ecosystems, NPS limits and relevant ANZECC 2000 Guideline values and outcomes sought by the community.
- We **oppose** the Freshwater Outcomes for Canterbury Rivers as there needs to be much stronger water quality outcomes.

The RR&BA's sole interest is for the benefit and wellbeing of the residents and businesses that live adjacent to the Ōtākaro Avon River, there is no commercial gain related to this submission.

Kind regards,

Hayley Guglietta

Richmond Residents and Business Association

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