

Christchurch City Council
Christchurch
October 2013

Submission to the Draft South New Brighton Reserves Management Plan, 2013
Draft South New Brighton Reserves Development Plan, 2013
For Bligh's Garden, Bridge Reserve, and South Brighton Park

Prepared by Christchurch City Council, P.O. Box 73013, Christchurch

Submission by Avon-Ōtākaro Network, 9 Stable Way, Christchurch 8051

Avon/Otakaro Network supports the Draft Management Plan in Part

Part 1

Avon-Ōtākaro Network (the Network) is a network of individuals and organisations with a shared and popular vision for the future use of the Avon River residential red zone lands as an ecological and recreational reserve. The vision is to establish a community-driven science informed living memorial to rejuvenate and nurture the long-term environmental, economic, community and spiritual wellbeing of the eastern suburbs and of those living throughout greater Christchurch. This vision directly complements public feedback generated by the Christchurch City Council Share an Idea campaign which identified very high levels of support for community input into the future of the city, a greening of the city, with continuous parklands along the banks of the Avon River to the sea.

[Do we wish to add the Avon Vision here](#)

The Avon/Ōtākaro River

Despite the negative effects of urban development, the Avon/Ōtākaro River is highly valued as an important feature of Christchurch. Over many years significant works in the riparian margins of the River have been undertaken. Changing the riparian margins and water quality of waterways affects biodiversity in them. Successful changes to stream bank vegetation will increase the availability of food and energy sources for plants and animals. The enhancement of this lowest end of the food chain will create greater opportunities for higher plants and animals.

The Avon-Heathcote Estuary Ihutai

The Avon-Heathcote Estuary Ihutai is the largest, semi-enclosed, shallow estuary in Canterbury, and remains one of New Zealand's most important coastal wetlands, despite being partially surrounded by residential housing of Christchurch City.

At approximately 700 hectares, the Estuary is relatively small. Its size, however, belies the value it has held, and still holds, as a place special to people for its rich variety of bird life, as a

mahinga kai area, as a recreational playground and as an educational resource. Like all wetlands, the Estuary filters and processes water from the catchment.

While the River, Estuary and catchment have undergone dramatic change and degradation over the years, particularly in relation to indigenous flora and fauna, margins and water quality, they still remain important places for the residents of Christchurch. The series of earthquakes that rocked Canterbury between 2010 and 2012 affected the delicate environment of the River and Estuary. Understanding the full implication of the earthquakes on the ecology and biota of them will take many years and it is likely that it will be some time before they reach a new natural balance.

Part 2 - An Opportunity for Regional Significance

Some urban waterways are among the natural features considered regionally significant, a classification that local councils must consider when urban development is proposed. Te Ihutai/the Avon-Heathcote Estuary and Travis Wetland are listed as regionally significant.

As bird life and mahinga kai are reliant on high levels of biodiversity and water quality it is important that we all now realise the opportunity and work toward achieving the biological requirements for adding the lower Avon River to those on the regionally significantly list.

Part 3 - The Submission

With regard to Draft South Brighton Reserves Management Plan of August 2013 and the Draft South New Brighton Reserves Development Plan of August, 2013, the Network congratulates the Christchurch City Council for incorporating the values and aspirations expressed by the community and for recognising the ecological, recreational, cultural landscape and heritage values of the three reserves and of the Avon-Heathcote Estuary Ihutai.

The Network wishes to comment on the Draft South Brighton Reserves Management Plan of and the Draft South New Brighton Reserves Development Plan of August, 2013 as follows:

1. Evidence of Scientific Research

2.1 Ecology

Objective: To protect and restore ecological values of the reserves and estuary edge (5)

Policies 2.1.1, 2.1.2 and 2.1.3 refer to “the management of natural environmental processes”. The Network requests that there be by way of an Explanation, documentation of the scientific research which has been undertaken that establishes what the natural environmental processes are and what management will be undertaken to facilitate the protection and restoration of the shoreline, salt marshes and Jellicoe Marsh.

2. Erosion and Sediment Controls in the Restoration and Development Phases

a. 2.1 Ecology

Policies 2.1.4 Restore, develop and maintain the river and estuary margin...

2.1.5 Retain and/or replant trees....

2.1.6 Plant removal and minimising erosion....

2.1.7 vegetation and tree clearance....

2.1.11 manage land use activities along the river and estuary margin....

b. 2.3 Flood Protection

Policies 2.3.1 the raising, extension and maintenance of stop banks

2.3.2 the location of stop banks

The proposed work involves work to land, the river and estuary margin. Discharges, sediment and erosion have the potential to negatively affect the margin stability and water quality of the river, the estuary and the coastal marine area. The key issue for the Network regarding restoration and development is erosion and sediment control.

The Receiving Environment

The Estuary is a semi enclosed coastal water body with the Avon River and the Heathcote River flowing into it and with a free connection to the sea. The Rivers and Estuary are associated with high rates of biological productivity and provide rich feeding grounds for migratory birds and spawning sites for fish and shellfish.

Regulation

The Resource Management Act 1991 (RMA) establishes the framework of objectives, policies and rules within which the effects of construction related runoff is managed. The sustainable management purpose of the RMA requires management for protection of natural and physical resources in a way or at a rate, that enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while avoiding, remedying or mitigating any adverse effects of activities on the environment. Further, Section 17 places a general duty on every person to avoid, remedy or mitigate any adverse effects on the environment. The 'environment' is widely defined in the RMA to include all natural and physical resources; ecosystems and their constituent parts, people and communities, amenity values and the social, economic, aesthetic and cultural conditions that affect these matters.

Under Section 30 of the RMA every Regional Council has a number of functions for the purpose of giving effect to the Act in its region, including, the control of the use of land for the purpose of:

- Soil conservation
- The maintenance and enhancement of the quality of water in water bodies and coastal water,
- The maintenance and enhancement of ecosystems in water bodies, and,
- The control of discharges of contaminants into or onto land, air water and discharges of water to water.

The Avon River and the Avon-Heathcote Estuary environments are natural and physical resources in terms of the RMA and are required to be sustainably managed.

Standards & Setting of Conditions

The New Zealand Transport Authority provides the minimum standards for erosion and sediment control which development projects must comply with. The standards were prepared with the intention that they will meet or exceed current local guidelines.

The Network recommends that the local standard, Erosion and Sediment Control Guidelines (Ecan) be used in conjunction with the NZTA standards when setting stringent consent conditions to mitigate the key issues that have been identified by the Network. These are as follows:

1. Construction and maintenance activities must avoid or mitigate effects of soil erosion, sediment runoff and sediment deposition by -
 - Erosion and sediment control training
 - Minimizing disturbance
 - Reducing the area available for erosion
 - Protection of steep slopes
 - Stabilising exposed areas rapidly
 - Minimising sediment transportation
 - Employment of detention devices
 - Planning controls for extreme weather events
2. Areas susceptible to erosion and sediment deposition will be identified and erosion and sediment control measures be implemented that are appropriate to each situation with particular emphasis on high risk areas.
3. Bioengineering and low impact design elements are implemented where practicable

The overarching principles of erosion and sediment control at earthworks sites are to limit sediment transport and deposition and to apply the most appropriate solutions for the circumstances. Integration of as many concepts as possible provides the most effective control. To ensure the controls are effective, an understanding of the basic principles of erosion and sedimentation is required, as is ensuring that erosion and sediment control practices are considered carefully and managed throughout the project's planning, design, restoration and development phases.

3. Stormwater and Impervious Surfaces

2.6 Recreation and Sport

Policies 2.6.4, 2.6.5, 2.6.10, 2.6.13, 2.6.14, 2.6.16, 2.6.17 all refer to community recreation and sport activities and built facilities, carparks, toilets, camping ground and camping ground boundary.

2.8 Buildings, Structures and artificial surfaces

Policies 2.8.1, 2.8.2, 2.8.3, 2.8.4, 2.8.5, 2.8.6, 2.8.7, 2.8.14, refer to the construction of new buildings and facilities.

2.10 Motor Vehicles

Policies 2.10.3 refers to driveways

To mitigate against further contamination of the Avon River and Avon-Heathcote Estuary Ihutai by untreated stormwater, the Network requests that research and production of a report be undertaken for point source mitigation. The report must give respect to the Surface Water Strategy of the Christchurch City Council 2009, The Water and Waste Guidelines – 6 Values Approaches of the CCC and the Natural Environment Recovery Programme for Greater Christchurch – Whakaaro Taiao 2013 (the NERP).

The NERP calls on us to act on opportunities for stormwater treatment and improving the water quality and ecosystem health of waterways.

“Use low impact urban development and design/stormwater treatment systems/wetlands to attenuate stormwater flows, reduce sediment, and improve quality of stormwater into waterways. During rebuilding consider changing the form of waterways to enhance stream ecology. Plant river banks to provide food sources, habitat and shade.”

The Network promotes water sensitive urban design and promotes the construction of pocket park wetlands, the capture and reuse of rain water from built facilities, the use of rain gardens and the use of impervious surfaces in carparks and driveways.

The Avon/Ōtākaro Network wishes to thank the Christchurch City Council for the opportunity to comment on the Draft South New Brighton Reserves Management Plan, 2013.

The Avon/Ōtākaro Network wishes to be heard.

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Mark Gibson

Co-Chair, Avon/Ōtākaro Network

October, 2013

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Evan Smith

Co-Chair, Avon/Ōtākaro Network