



Submission to CCC on the Long Term Plan

On behalf of Avon-Ōtakaro Network

We wish to be heard

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AvON and our vision for the Ōtākaro Avon River corridor

Avon-Ōtākaro Network (AvON) was founded in 2011 to promote a popular vision for the future of the Ōtākaro Avon River corridor (OARC), including what was formerly known as the Avon River residential red zone.

Our vision is for:

- a multi-purpose river park from city-to-sea that meets a diverse range of community needs eg for environmental regeneration; celebrating heritage; food production; play, recreation and sport; arts and entertainment; learning, training, employment, business and tourism; and limited and conditional residential re-occupation.
- And, while allowing for these multiple uses, the maximum possible restoration of native ecosystems to enhance water quality, biodiversity, mahinga kai values and resilience to natural hazards.

We are a network of organisations and individuals who in 2012 submitted a petition to Parliament in support of this vision signed by over eighteen and a half thousand people.

All engagement with the community since, including that recently by Regenerate Christchurch, has indicated that the level of support for this vision remains extremely high.

For more info: www.avon.org.nz

Healthy Waterways

We very strongly support the identified Community Outcome of Healthy Waterways:

What this means for our district:

- Water quality in our rivers, streams, lakes, and wetlands progressively improves
- Waterways and beaches are safe for recreation
- An increasing proportion of our waterways support mahinga kai

Why it's important to us:

Residents value healthy waterways. Surface water quality is essential for supporting ecosystems, recreation, cultural values and the health of residents. Minimum water flows in streams and rivers are necessary to protect the health of waterways and safeguard drinking water supplies.

In her introduction to the LTP the Mayor also highlights six strategic directions that specifically include improved waterways.

However this strategic goal is not reflected in the LTP 2018/28 Infrastructure Strategy nor in the balance of priorities in the LTP.

We strongly submit that the balance of priorities is not correct and the following need significant reprioritisation for investment:

1. Stormwater infrastructure

There is inadequate investment in stormwater infrastructure and flood protection, particularly in support of the Avon Stormwater Management Plan.

You acknowledge:

“...the earthquakes reduced the capacity of the stormwater network over substantial areas and increased flood risk to many low lying parts of the city, far greater challenges than this are likely to result from climate change and sea level rise, and these challenges must be faced across the city Rising sea levels increase river levels, and this reduces the ability of the stormwater network to discharge and may affect large areas within the eastern suburbs.”

However there is inadequate investment to address this particularly in the Avon catchment at a time when a once in a lifetime opportunity has presented itself where space is available to improve water quality and deal with storm water entering rivers through constructed wetlands as well as enhance flood protection with the relocation of stopbanks.

It is our contention that you will not meet your commitment to progressively improve the water quality in the rivers, waterways and estuary and enhance mahinga kai values based on this level of investment in stormwater infrastructure. Additionally, there will be extreme difficulty in achieving Global Stormwater Consent (particularly with regard to the Ōtākaro Avon River catchment) which is due within the period of the LTP.

We submit that the Medium Option investment in:

Land drainage recovery programme (LDRP) 521 Avon floodplain management of \$98M
Avon stormwater management plan of \$19M,

at the very least, should be replaced by the High Option investment levels:

LDRP 521 Avon Floodplain Management Implementation to \$231M, Increased by \$133M
Avon stormwater management plan to \$66M, Increased by \$46M

2. Commitment to the Community Water Partnership

An effective way to improve stormwater quality and quantities is to address stormwater issues at source.

This is a cost-effective and strategically advantageous opportunity for CCC – especially since the LTP also identifies a shortfall in the investment required to cover maintenance of existing facilities and

treatment upgrades to meet discharge quality standards required for consent, based on current contaminant loads.

Reducing contaminants at source is a strategy that can reduce CCC's compliance challenge and practically help with waterways management at the same time. Engaging with the community around this challenge is a sensible step within the timeframe of the LTP.

Programmes that promote community awareness and education in these matters are a smart investment. The Community Water Partnership proposal is an excellent initiative designed to do this requiring just \$1M per annum. However this proposal is not funded in the LTP.

We submit that \$1M provision is made in Year 1 to fund the Community Water Partnership initiative

3. Waste Water infrastructure

Sewage discharges are **absolutely unacceptable** and culturally offensive to tangata whenua and pākehā alike, the upgrade of our sewerage network must be the top priority in terms of horizontal infrastructure spending.

In our view the deprioritisation of waste water infrastructure investment in the LTP is an abrogation of strategic direction and will negatively impact community outcomes very significantly.

The LTP identifies that deferral of wastewater works will mean more overflows in wet weather as a consequence of the leaky system. However, the vulnerability of the system to failure is also predicted to increase with rising flood and inundation risk over time. Therefore impacts of inaction (ie 'deferral' of solutions for the wastewater engineering issues) are expected to increase over time.

These impacts should be more fully considered in the LTP and should be itemised as cumulative losses. Deferral is extremely costly and not acceptable within the timeframe of the LTP.

What price do we put on the continuing degradation of cultural, social, environmental and ecological values? It is not good enough to argue that the river water quality and ecology is degraded already so increasing additional sewage discharges makes little difference.

Functional wastewater infrastructure is fundamental to societal, cultural and environmental health – it needs to be fully addressed to ensure an improving trend is delivered within the lifespan of the LTP.

There is an implicit acceptance within the LTP that cleaning our waterways is too hard but there are clear international examples with similar demographics where extremely polluted waterways have been made swimmable within a 20 year period. It is a matter of priority.

We are aware of advice to Council from the Christchurch West Melton Zone Committee, mana whenua and iwi that the current level of discharge of contaminants into urban waterways is unacceptable. Council must take heed of this advice.

Furthermore, it is likely that that the proposed level of investment will not meet legal obligations under the Waste Water Discharge Consent – or if it does, it will not meet the intent of progressive improvement in rates and volumes of discharge committed to in the consent application by CCC.

In short, the proposed deprioritisation of investment in waste water infrastructure investment is a total abrogation of Council responsibility and needs to be addressed even beyond the High Option investment identified for this within the LTP.

We submit that provision for waste water infrastructure must be increased beyond the High Option allocation to meet community expectations, the spirit of discharge consent conditions and strategic outcomes.

4. Waterway Ecology and Water Quality Improvement programme

We note that the budget for the Waterway Ecology and Water Quality Improvement programme has been cut by 15% in this LTP after a cut of 67% from when the programme was first initiated. This programme greatly assists CCC in meeting compliance with consents regarding water management.

Underinvestment in this programme once again does not meet the prioritised commitment to clean healthy rivers that restoration and enhancement of the biodiversity and ecology of riparian margins and waterways is fundamental to.

We submit that funding for this programme be restored to its initial level of \$1M per annum.

5. Pest Management

We note that there is no budget allocation for pest management particularly in regard to pest species in the Ōtākaro Avon River Corridor such as Canada geese, mallard ducks, rabbits, rats, possums, yellow flag iris, gorse, broom and Gunnera. The previous LTP service delivery target of ‘Nil notices of direction served following inspection of ECan listed pests’ has been deleted in the current LTP.

We also note that pest management and riparian maintenance in the Ōtākaro Avon River corridor has been non-existent or minimal since the earthquakes. As a result the level of infestation of pest species is now very marked and fast approaching environmentally critical levels and in some cases has potential for having a direct impact on the safety of human life.

At the same time there is now a need to reactivate the corridor and reinvest in its amenity value and realise potential for it to generate revenue in terms of visitor experience and eco-tourism.

We submit that specific budget of \$1M needs to be allocated to readdress pest management in the OARC as a matter of priority.

Investment in the Ōtākaro Avon River Corridor

There is currently no provision for investment in the Ōtākaro Avon River Corridor (OARC) except in regard to suboptimal investment in Avon Stormwater Plan and Land Drainage Recovery Programme infrastructure measures.

Yet it is acknowledged that the Regeneration Plan for the OARC is expected to be approved within the first year of the LTP period. Recent announcements by Regenerate Christchurch also indicate that a focus on environmental leadership with constructed wetlands and flood protection measures in the corridor are a key focus.

CCC acknowledges that there is high risk that it will need to commit funding to this.

The Council does not make a financial contribution to the regeneration of the residential red zone [in this LTP].

[There is] High Risk [this need will need to be addressed]

If the Council did contribute to the regeneration of the red zone, this could exceed \$100 million

[Strategy:] Update the Long Term Plan once a decision has been made about the Council's contribution to the regeneration of the residential red zone

We submit that in order to provide confidence for planners and investors that CCC

- 1) **Acknowledge the need now within the LTP and make provision now for \$100M of contestable seed capital to progress regeneration of the OARC as soon as the OARC Regeneration Plan is approved. This provision should be separate from and additional to investment in infrastructure for the Avon Stormwater Plan, Land Drainage Recovery Programme, Waste Water and the Ōtākaro Major Cycleway.**
- 2) **Make provision for a dedicated ring-fenced fund for activation events, and interim and transitional uses of \$250,000 for the OARC per annum from Year 1 over 3 years, this would be independent of the Enliven Places Fund.**
- 3) **Prioritise the Otakaro Avon River Major Cycleway for implementation in Year 2 once the OARC Regeneration Plan has been approved in order to stimulate regeneration in the east. This cycleway has been deprioritised in this LTP.**

Funding this expenditure

We are very aware that many of the above provisions will require nett additional expenditure.

We would submit that the provisions we have listed are essential spending and largely reflect shortfalls due to inadequate investment by central government in earthquake recovery legacy issues. Council needs to advocate strongly with central government to ensure this shortfall is met, specifically in the review of the cost-sharing agreement and the magnitude of any further investment package.

Part of this is acknowledging that CCC cannot meet essential funding needs for core infrastructure from current resources with consequent substantial deterioration of basic service delivery and creating even more significant legacy issues for future generations. Acceptance of third world service delivery is not appropriate from Council in these circumstances – much stronger, visible advocacy that produces results is necessary.

We submit that the Three Waters and the infrastructure that supports their management are the top priority core service responsibilities of Council and must take precedence over all others including roading.

Certainly expenditure on nice-to-haves such as multi-purpose arenas must take second place to restoring and enhancing these core services, existing arrangements with central government notwithstanding.

We would also remind Council that in Eastern Vision's EVO::SPACE consultation there was some public appetite to fund aspirational projects in the red zone via a targeted rate.