

**Christchurch City Council
Draft Integrated Water Strategy Submission
July 2019**



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1. Introduction

The Ōpāwaho Heathcote River Network

The Ōpāwaho Heathcote River Network (The Network) is an umbrella organization that facilitates and supports the values, efforts, and needs of our communities along the River. The Network is made up of representatives from eleven community groups in the Ōpāwaho Heathcote catchment and the Avon-Heathcote Estuary.

Our Vision is; *'An ecologically healthy river that people take pride in, care for and enjoy.'*
Our Purpose is; *'To facilitate a collaborative network which advocates for the regeneration of the whole of the Opawaho Heathcote River.'*

The Network provides a voice for local river-care organizations and the communities. It collaborates and advocates with decision making organizations including Christchurch City Council (CCC) and Environment Canterbury (ECan).

The Network seeks to work with the CCC, ECan, Ngai Tahu, community groups and other agencies to develop an integrated approach to the management of the Ōpāwaho Heathcote River.

2. Draft Integrated Water Strategy

The Ōpāwaho Heathcote River Network congratulates the Christchurch City Council on its commitment to a long-term Integrated Water Strategy and for producing a comprehensive and well-written document. It captures well the issues for future integrated water management in the City.

The structure of the document is, however, complex and multi-layered with the content necessarily mostly at a general level. There is an overarching vision, eight guiding principles, four goals, eleven objectives, eleven key strategy issues and at least thirty-eight approaches which are designed to meet the objectives. These make it difficult to read and digest. Further engagement with the public is recommended.

Restoring the waterways of Christchurch needs an integrated approach. Ecosystems do not operate in silos.

The bringing together into a single document of thinking for stormwater, wastewater and water supply is a very significant and powerful step forward. It is noted that some of the detailed proposals in the earlier three individual Strategy documents have not been brought forward into this Integrated Strategy. e.g. the Surface Water Strategy of 2009. Is it the intention that a subsequent Implementation Plan for the Integrated Strategy will lay out the detail?

The report will provide a shared focus for CCC staff and will enable them better to work together across the departments. It is not sufficient to encourage integration within the Three

Waters workgroup. Other CCC units, such as Greenspace and Streets, have a major role to play in restoring our waterways.

The 100 year horizon is too long a time for accurate prediction but we accept that such a long horizon is necessary for slowly-changing things such as climate change, sea level rise and nitrate concentrations in groundwater. This document sets an excellent foundation and there will be periodic revisions. The Network supports the review of the report every six years to tie in with the LTP planning cycle.

3. Vision and Guiding Principles

The Network supports the overall vision and guiding principles set out in report and commends the Council for adopting them.

Comments

- The “vision” achieves much in bringing together the many braids of water issues. The task of projecting forward, however, is still to be done. This should be a core task of the first review in 2026. It is recommended that a more inspiring and ambitious approach be taken. We need to be creating a City that has made the most of its water opportunities and managing it in a way that creates sustainable ecological systems. In the next 100 years is it reasonable to expect our urban rivers to be swimmable?
- It is also important to take a wider view of emerging issues than valuing water and water services. It is recommended that a Whole of Council visioning project be undertaken by the strategy group in CCC to look at what the City might be like in 100 years. That would take into account projections of wider group of factors.
- Integration needs to improve not only within the Council but also between the Council and the community and among agencies. The Network notes and welcomes the good working relations at staff level between CCC and ECan.

4. Key Issues Facing the Management of Three Waters in Christchurch

The Network agrees with the key issues facing the management of the 3 waters in Christchurch and commends the Council for adopting them.

Comment

- Poor state of waterways – The importance of Maori cultural values with regard to cleaner waterways is strongly supported by the Network. There are, however, other reasons why our waterways should be cleaned up. eg ecological and the wishes of the general public. These should be included in the wording of this strategic principle.

5. Goals and Objectives of the Draft Integrated Water Strategy

The Network agrees with the goals and objectives of the Integrated Water Strategy.

Comments

- 7.1 Objective1: Awareness and engagement

The Network recommends that the Council gives more encouragement including incentives to householders to take responsibility on their own properties. Many people want to play a part in reducing damaging flows to our waterways. The collective actions of many individuals can make a huge difference at the catchment level.

- 7.3 Objective3: Enhancement of ecological, cultural and natural values

Invasive exotic weeds have become widespread in our waterways and are a huge threat to the natural ecosystems- as well as to the rapid removal of flood flows. A recent report “Lower Heathcote Weed Survey” by Nicolas Head of CCC and his presentation at the Network’s AGM has alerted us to extensive invasions by several weed species in the Lower and Mid Heathcote. Some of these may no longer be able to be eradicated. A specific issue that needs addressing urgently is that existing dredging and weed cutting techniques multiply the weed problem as they create small pieces that spread and re- establish upstream and downstream.

The Network recommends that a Plan for best practice aquatic weed management be prepared as a matter of urgency - with the input from River Care groups.

- 7.3 Objective 4 - Water Quality improvement

The OHRN welcome the increased sediment control measures as sediment is a major contaminant in the Ōpāwaho Heathcote River. It smothers and kills aquatic life. The network recommends that the CCC, ECan other agencies and the Network develop a plan and an adequately funded implementation programme to reduce significantly the overland sediment flow from the Port Hills into the Ōpāwaho Heathcote River. (Sediment in the Stormwater system is separately controlled by conditions in the comprehensive stormwater consent.) All agencies need to work together to enable the continued native revegetation of the Port Hills, the reduction of sediment loss and the subsequent improvement in the ecological health of the River.

- 7.4 Objective 5 - Wastewater overflow management

Wastewater overflows pose a risk to environmental and cultural values of our urban waterways, for this reason the Network recommends to the Council that it requests ECan to notify its current application for a variation to its Wet Weather Overflows consent. The Network and other River Care groups wish to make submissions to the independent panel that will set the conditions on the consent. (This would ensure an equally robust system applies for the variation to the wastewater consent as to the recent CCC Global Stormwater Consent.)

6. Recommendations for Achieving the Aim and the Vision

The Network agrees with the overall recommendations for achieving the aim and the vision for managing the ‘three waters’ in Christchurch

Comment

- The Network notes that the report is very light on specifics when it comes to the important phase of implementing the strategy. Implementation Plans are referred to as a means of measuring achievements of the Integrated Water Management Strategy. Also key parties and stakeholders are identified. But there is no indication of timeframes or processes for their development. The Network considers that Implementation Plans are needed within the next two years to set out the missing detail of how progress is to be made and not just to record achievements after they occur. Also as stated earlier in our submission there are detailed implementation measures in the earlier individual strategic water plans that need to be revisited and in some cases re-adopted.
- The Network recommends that the final Strategy includes a timeline for the production of an implementation plan or plans and a specific commitment to include River Care groups in their development.

7. Overall Direction of the Draft Integrated Water Strategy

The Network agrees with the overall direction of the Integrated Water Strategy. It is an excellent first step.

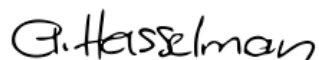
It needs to be followed up with:

- a whole City visioning project
- Implementation Plans within the next two years.
- The first review in 2026 a stronger inspirational forward focus and capture the potential of our City to be a water sensitive city

The City and this strategy need to provide more opportunities and incentives for the community and individuals to take responsibility and implement behaviour change in the management and use of our unique water resources and ecological systems.

Thank you for the opportunity to make this submission.

We wish to be heard and we look forward to elaborating on our submission.



Annabelle Hasselman
Chairperson
Ōpāwaho Heathcote River Network