



Whitewater Canoe Club (Inc), PO Box 4476, Christchurch

3 April 2009

Committee Secretariat

Local Government and Environment Committee

Parliament House

Wellington

**SUBMISSION ON BEHALF OF THE WHITEWATER CANOE CLUB (INCORPORATED)
ON THE RESOURCE MANAGEMENT (SIMPLIFYING AND STREAMLINING)
AMENDMENT BILL**

Introduction

1. This submission is on behalf of the Whitewater Canoe Club (WWCC). The WWCC is based in Christchurch, and has approximately 200 members. The WWCC has been in existence for approximately thirty years. The WWCC is affiliated to the New Zealand Recreational Canoeing Association (NZRCA).
2. Our members paddle a wide range of rivers, primarily in the Canterbury, West Coast, Buller and Otago regions. Some of our members paddle primarily on trips organised by our club – typically we organise a trip each week of our season, which commences at the start of September and finishes at the end of May. Some members paddle only occasionally on club trips, paddling instead with groups of friends and contacts. Others paddle a mix of club and private trips.
3. Our members are gravely concerned over the enormous threat which faces our rivers, locally and nationally. We oppose some of the key changes in the Resource Management Amendment Bill (the Bill) for the reasons outlined in paragraphs 4 - 11. Further, in paragraph 12 we ask the Committee to consider strengthening the Crown's role in environmental protection generally, and in paragraph 13 we ask the Committee to recognise the importance of recreation, and continued public access to rivers and the water in those rivers.

Opposition to various proposals contained within the Bill

4. The context for this submission is one in which we believe our rivers are severely threatened. So too is our chosen form of recreation; and our birthright to those rivers and to the water contained within them. We continue to read about new developments for irrigation and energy, which either de-water our rivers or dam them, destroying their natural state. As kayakers we value, tremendously, variation in river flows and rely on flood events to clean, shape and change our rivers. Water rushing down to sea is not wasted, it preserves the ecological balance of our country and provides recreational opportunities for its citizens.
5. In Canterbury in recent times, along with other local clubs and our national body the NZRCA, we have responded to the proposed Central Plains irrigation scheme to ensure that the scheme does not compromise the amenity values of the river, as it has the potential to significantly reduce water levels in the Waimakariri and cause major hazards to be erected in the river channel. We are currently working within the Resource Management Act (RMA) framework, seeking a Water Conservation Order to protect our precious local river, the Hurunui. If not successful, then indications are that various schemes involving dams for irrigation may be initiated. We have very recently submitted against hydro scheme applications on the Matiri; Arnold; and Mokihiui. The wonderful Waitaha is under threat, and the Matakītaki is also threatened. As part of our verbal submission we will outline the enormous number of rivers in the South island which are threatened by “development”.
6. Many of our local and national rivers are under pressure from development, and typically as recreationalists and volunteers we are challenging proposals being made by large companies. We are concerned that the RMA changes outlined in the Bill may make it more difficult for volunteer organisations such as our own to participate in a democratic process by further shifting the balance of power in favour of developers.
7. Clause 133 – Security for Costs. We are concerned that if the Environment Court requires a bond to be paid that such a cost will reduce our ability to participate in processes in which we have a legitimate interest and concern. As volunteer organisations we do not have “deep pockets”, whereas the proponents of many developments see such a bond as a minor part of their overall legal bill within a multi-million dollar project. **We ask that the Committee delete clause 133.**
8. New section 94 – Reduction in public notification. As a volunteer organisation we struggle to maintain a watching brief on the number of rivers which are under threat. Recently the public notification for the proposed Matiri hydro scheme was undertaken in Tasman area newspapers, but not the Christchurch Press – yet a large number of users of the Matiri are resident in Christchurch. Advertising was placed at the river during the winter when fewer river users are at the river. We are opposed to any reduction in public notification – if anything, some expansion in notification is highly desirable to encourage community involvement in the process. **We ask that the Committee delete the new section 94.**
9. Clauses 132 and 136 – Restrictions on appealing plans. Any restriction on a local and comparatively “cheap” appeal process, replacing it with a court hearing, will result in an increase in cost for an appellant – and therefore reduce the likelihood that any appeal would be made. This is contrary to democratic process, and effectively favours organisations or individuals with substantial financial resources over those that do not have the resources. As noted above, we are a volunteer organisation, as is our parent body the NZRCA. We do not have the resources to be able to compete financially with large corporates, and anything which adds cost to any RMA process will reduce our ability to participate. **We ask that the Committee delete clauses 132 and 136.**

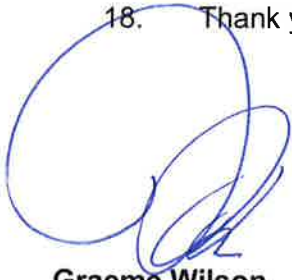
10. Clauses 35, 91-106 – Expanding the existing call in powers for proposals of national significance. We are extremely concerned that proposals of “national significance” may be extended to include hydro and irrigation projects, big or small, without any consideration given to the national significance of the rivers and landscapes which are destroyed by the proposal. Further, we are concerned that the loss of access to a significant resource for purposes of recreation effectively places the subjective “greater good” above the costs to the individuals who are impacted by the decision. We ask that the Committee reconsider any move to strengthen the call in powers.
11. Clause 131 – Weakening public interest group power to join cases. As noted above, we are a volunteer organisation. It is simply not possible for the WWCC to participate fully in all the variety of hearing processes which relate to the rivers we paddle. If we cannot at a later stage join an appeal and assist (typically) another volunteer group, then our ability to contribute to a valid process is seriously affected. In paragraph 8 we noted the difficulties we face as an organisation in simply finding out what is happening with existing notification processes. Further, as volunteers we do not have the resources to contribute to every hearing which takes place. An ability to join in the process at a later stage is important if all interest groups are to be adequately represented.

Other comments

12. We are heartened by the establishment of an Environmental Protection Agency (EPA) outlined in the Bill. However, we would like to see the role of the EPA strengthened as a genuine advocate for the environment. Many submissions against environmental threats are currently made by volunteer and/or not-for-profit entities (Fish and Game, Forest and Bird, and others) and to have additional expertise provided and funded by the Crown to further protect our national environment would be a tremendous improvement.
13. Further, the WWCC is also in the position of wanting to protect our natural environment but also to protect the extremely important recreational amenity provided by our rivers. The scenery and environment is all part of the experience of whitewater paddling. We believe that the Committee in reviewing the RMA should also highlight the importance of protecting and enhancing recreational amenity, rather than focussing on economic or environmental dimensions.
14. Our whitewater rivers are precious. Our country has already lost too many, and we want to protect those that are left. Any change to the RMA which imposes additional cost or complexity on our organisation has a very real impact on our ability to play our part in protecting our rivers and pursuing a fantastic form of recreation.

Hearing

15. As outlined above, we oppose many of the proposed changes to the RMA.
16. We wish to be heard in support of our submission – preferably in Christchurch.
17. I can be contacted via email at conservation@whitewater.org.nz or by cellphone 0274 802 405.
18. Thank you for the opportunity to make this submission.



Graeme Wilson

Vice President and Conservation Officer

Whitewater Canoe Club