Actions for healthy waterways consultation

Submission from

The Styx Living Laboratory Trust

Board of Management

Arising from the eastern edge of Christchurch Airport, and discharging 30 km away into the Brooklands Lagoon, the Purakaunui (Styx) River and its tributaries are a spring fed river ecosystem skirting the Northwest edge of the Christchurch urban area. The Purakaunui is approximately 22 km in length and the entire catchment covers an area of approximately 7000 ha. The Purakaunui is home to many species of freshwater fish, wetland birds and is an important source of mahinga kai for Ngāi Tūāhuriri.

The Styx Living Laboratory Trust, is a local river care group, which was established in 2000 to achieve Vision 3 (Develop a “living laboratory” that focuses on both learning and research) of the Christchurch City Council’s ‘Styx Vision 2000 – 2040.’ The Trust has since encompassed a role of guardianship and advocacy for the waterway and the biodiversity of the surrounding land as a living part of the Canterbury landscape.

Representatives with educational, cultural, research, and community interests including representatives from local government bodies are appointed to a Board of Management by the voluntary Trustees to administer the aims of the Trust.

We are advocates for maintaining water quality and other values (including drainage, ecology, landscape, culture, recreation, and heritage values) in the river. We care deeply about our water and want it to remain clean, healthy, biodiverse and available for future generations to use and enjoy.

The ‘Styx Vision 2000-2040’ outlined five visions for the Styx:

**Vision 1** - Achieving a viable spring fed ecosystem

**Vision 2** - Creating a “Source to Sea” experience (i.e. creating a continuous walkway along the length of the Styx River to enable people to experience and learn about the river system)

**Vision 3** - Develop a “living laboratory” that focuses on both learning and research

**Vision 4** - Establishing the Styx as “a place to be” (i.e. recognising, maintaining and enhancing the special character of the Styx River area)

**Vision 5** - Fostering partnerships with other organisations to achieve the above objectives
This background context has been provided as these visions are at the heart of our submission. We have not addressed each individual question raised in the discussion document, as forming a consensus among a large group of people, to each question, would be a difficult task. Hence, we have instead highlighted the key points in the document that matter to our organisation.

The Styx Living Laboratory Trust:

1. **Generally supports** the relevant proposals set out in this discussion document and believes these will be positive for freshwater management in New Zealand and emphasises the crucial role that partnerships will play going in ensuring the targets are met. We would also be supportive of increased opportunities for citizen science and research/learning in New Zealand’s freshwater management.

2. **Supports** the idea that it is better to prevent the degradation of freshwater than to restore degraded waterways. The Trust also supports the implementation of more comprehensive and integrated reporting systems, the increased integration of Māori world views and more extensive controls on the management of land uses around freshwater ecosystems.

3. However, we **note** that there are numerous complex proposals integrated into this discussion document and there is a lack of clarity surrounding the environmental outcomes sought. Also, clearly defined definitions of terms are lacking throughout the document and subsequent policies with interchangeable terms being used. It is vital that these terms are consistent across policies.

4. **Argues** for greater inclusion of groundwater within the NPS for freshwater to ensure the protection of spring-fed streams and rivers such as those in the Styx area. Further clarification is recommended on the minimum flow in spring fed streams.

5. **Supports** the creation of the Te Mana o te Wai Commission but is unclear where the recreational use of water fits within hierarchy of priorities of Te Mana o te Wai/ whether it is included in this framework at all.

6. **Supports** the additional freshwater quality indicators/attributes but argues for the inclusion of urban/rural contaminants such as copper, zinc, cadmium and other metals.

7. **Supports** the introduction of stricter bottom lines, efforts to protect wetlands and the proposed changes around fish passages but **opposes** the use of offsets as a mechanism to offset habitat destruction. Freshwater ecosystems
are complex and this created habitat would not necessarily exhibit the same values as the natural habitat and we worry that it would create a precedent for the destruction of our current valuable freshwater habitats.

8. **Supports** in theory the establishment of the National Environmental Standard for Wastewater Discharges and Overflows.

9. **Supports** the proposal for all farmers to have a farm plan with a freshwater module and efforts to stop further land intensification.

10. **Strongly supports** the integration of setbacks for stock exclusion from waterways. We would support the highest proposed setback distance. We also stress that it is important that these setbacks are enforced.

The Styx Living Laboratory Trust commends the Ministry for the Environment for producing the discussion document and thanks the Ministry for the Environment for the opportunity to comment on the discussion document – Action for healthy waterways.