April 9, 2021

Please note:

I have chosen to submit via an email message rather than by the website form. This is because, apart from matters involving the Water & Land and Biodiversity & Biosecurity sections, I do not have the time and/or background to do the homework needed to informedly answer the majority of the questions in your form (Issues and Opportunities, Options, funding pathways etc).

My name: Nick Ledgard

My email address: nick.ledgard@xtra.co.nz)

My physical address: 191 Carrs Road, Loburn, RD2, Rangiora 7472.

My District: Waimakariri

I am submitting on behalf of the Ashley-Rakahuri Rivercare Group Inc and BRaid (braided river aid)

Inc – for both of which I am currently Chair.

I would like to speak to this submission on either April 27 or 28. I am not available on May 4.

My submission is as follows:

Urgent need for environmental management action on Canterbury's braided rivers

Braided rivers are a diagnostic and well-known feature of the Canterbury province. In the LTP it is obvious that ECan recognises this, as these rivers feature in most of the images shown. But this recognition is recent and can be misleading, as historically braided river use has been dominated by 'mining' for water, shingle/gravel and recreational purposes, often at the expense of unique environmental values. The main management purpose has been flood protection, which must remain as the No 1 goal, but all too often this has also unnecessarily compromised on-site conservation values.

On the plains, over 90% of what one sees above ground is of recent origin ie., was not present 200 year ago when European settlement first began. The braided rivers are unique, as it is only in them that can one still see indigenous life remaining in its original form. The most obvious component of this ecosystem is the birds - such as the wrybill, black-fronted tern and black-billed gull. All these bird species are now listed as endangered with declining populations. Greater emphasis must now be placed on conserving and improving these important indigenous remnants.

Future braided river management **must** pay more attention to maintaining and improving environmental and conservation values. To be sure, the Consultation component of the LTP contains the right words to support this (in the Water & Land and Biodiversity & Biosecurity sections), plus the Braided River Revival proposal is indeed welcomed. One must also note that such sympathies can be found in previous plans. **BUT** all these could be described as 'platitudes', as to date there is very little evidence of any on-the-ground operational actions to implement these sympathetic intentions. Indeed, many of the historic 'mining' actions continue, such as the excessive extraction of water and gravel. The latter is undertaken via consents granted by ECan, but many of the conditions stated therein are not only wanting, but poorly implemented and enforced. All this has directly led to significant loss of traditional braided river bird habitat, particularly relevant to feeding and breeding opportunities.

Even the important flood protection work has had a 'blinkered' approach, with little thought as to the environmental values that such an approach threatens. In the lower stretch of the Ashley-Rakahuri (where nearly all the bird activity is concentrated) such management has led to a loss of over 50% of the open braid-plain since the mid-1900s. Most of this has been due to the 'encouraged' widening of a vegetated berm zone, which indicates that the fundamental basic question of 'how much berm do you need to protect a stopbank?' has never been adequately addressed.

The Ashley-Rakahuri river has been used above as an example of deteriorating environmental values, but the same story could be described for most braided rivers in Canterbury. This is especially so for the smaller foothills-fed rivers such as the Orari, the Opuha and the Opihi.

All the above has been noted by the two volunteer organisations which I chair – the Ashley-Rakahuri Rivercare Group Inc (ARRG) and BRaid (braided river aid) Inc. Needless to say, we have alerted ECan of our concerns. In addition, there is considerably more detail (with suggestions for appropriate change) in another submission to the LTP by one of our volunteers.

Conclusion. ECan owns the braided riverbed on which ARRG has worked for over 20 years. They were responsible for setting up the Group in 1999, and have helped us to maintain bird populations and to advance to the status where we won the Australasian Wildlife Management Society's 'Practical Management Award' for 2018. Hence, we are most grateful for all the support we have received from ECan over the years. However, as indicated above, the problems associated with deteriorating braided river habitat are still real and need urgent attention. It is now time for action, not just words.