



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

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15 October 2010

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West Coast Regional Council  
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## **Whitewater Canoe Club**

### **Submission on the proposed West Coast Regional Council (WCRC) Regional Land and Water Plan**

#### **Details of submitter**

This submission is on behalf of the Whitewater Canoe Club (WWCC). The WWCC is based in Christchurch, and has approximately 200 members. Our members paddle a wide range of rivers, primarily in the Canterbury, West Coast, Buller and Otago regions. The WWCC has been in existence for approximately thirty years.

Amongst other rivers, we (and others) paddle:

- Buller and its tributaries
- Grey
- Karamea
- Styx
- Mokihinui
- Maruia
- Crooked
- Taipo
- Arnold
- Arahura
- Toaroha
- Kokatahi

- Whitcombe
- Hokitika
- Kakapotahi
- Wanganui
- Waitaha
- Perth
- Whataroa
- Waiho
- Fox
- Landsborough, and
- Waiatoto.

Note that this is not a complete list.

As well as regular club trips, our members also paddle in small groups on west coast rivers on a regular basis, and invest considerable time and money in doing so.

Further, the west coast is a major national and international kayaking destination in its own right – on par with any other major international destination.

Rather than the west coast rivers duplicating one another, they are in fact complementary to one another and form a nationally and internationally important package. They offer different challenges and a mix enabling paddler development, as well as some of the most technically challenging and demanding whitewater available. Flow characteristics may also mean that one river is available when another is not.

**The specific provisions of the proposed plan that this submission relates to are as follows:**

Firstly, as a general observation we believe that kayaking is a very significant recreational activity in the region. Accordingly, whilst in a number of places kayaking is picked up loosely under “recreation” or “amenity” – eg 4.2.1e – or maybe “navigation” – eg, 4.2.1.h – we believe that specific recognition of kayaking amenity should feature within objectives and in a number of the rules listed within section 18, and within schedule 5.

We have some additional general comments which we believe will be best addressed in more detail within the hearing.

Further, we have some specific comments as follows:

## **Section 4**

A specific objective could be added along the lines of: *to preserve and enhance the kayaking amenity offered by the region's rivers*

## **Section 6**

We support 6.1, 6.2 and 6.3.1 – although these could be strengthened to specifically include kayaking amenity.

However, we are opposed to policy 6.3.2 particularly as outlined in the explanation section. We believe that although water is renewable, rivers are not – and are destroyed by such development. We believe that as a country our rivers have already been over-exploited. For example, the New Zealand Energy Strategy notes that over 80% of our country's hydro electricity generation resource has already been developed. (New Zealand Energy Strategy, 2007, section 9.1.2). How many more rivers will be lost to hydro development or irrigation?

Further, in regard to mitigation

- ▶ one river is not the same as another river
- ▶ flat water kayaking is not a substitute for whitewater – or vice versa
- ▶ non-whitewater mitigation is not mitigation for the loss of whitewater
- ▶ artificial courses can provide only limited mitigation
- ▶ flow releases and flow regimes generally must consider recreational needs rather than simply environmental flows.

We do not believe that more rivers should be sacrificed “for the greater good.”

Our views on this matter will be discussed in more detail at the hearing.

## **Section 7**

Commitment should be made to preserving natural character and recreational amenity. There will also be conflict between some of the objectives – eg, 7.2.1 and 7.2.2. We suggest that 7.2.1 be given primacy.

With respect to mitigation in 7.2.5, refer to the comments above.

### **Section 18, rules 25 and 47**

We do not believe that any construction of a dam should be a permitted activity. Although the rule considers fish passage, it does not consider recreational use. As well as impeding or preventing kayaking access, even low dams can be extremely dangerous to kayakers and will lead to drowning.

Accordingly, any construction of a dam on any stretch of river must be publicly notified with a resource consent required.

Further, the conditions should provide for the removal of the dam at the end of the permitted length of time.

### **Section 18, rules 26 and 27**

Placement or alteration of structures in rivers is also inherently dangerous for all river users. Accordingly, we submit that any such construction or alteration must be publicly notified with a resource consent required.

### **Section 18, rule 33**

Kayakers have frequent problems with willows which are often used for flood protection works in rivers. Willows and other plantings which end up in waterways can lead to entrapment and death. We are opposed to any further willow plantings – we consider that willows should be listed as a pest plant in rule 33c.

### **Section 19**

We believe that the Council should mandate that any applicant should consult with parties likely to be affected by the proposal – as outlined in 19.1c.

### **Schedule 5**

Although loosely covered, we believe a separate schedule listing rivers in the region which are kayaked would be of value. Mr Andy England of Greymouth has been undertaking a river inventory, and this would be a useful starting point.

Such an approach would require an applicant to consider the impact on kayaking amenity and then to include an impact assessment as part of their application.

**We seek the following decision from the West Coast Regional Council**

We ask that the WCRC adopts the specific suggestions and general comments we have included in this submission.

We wish to be heard in support of this submission.

If others make a similar submission we would be prepared to consider presenting a joint case with them at any hearing.

I can be contacted at 0274 802 405, emailed at [conservation@whitewater.org.nz](mailto:conservation@whitewater.org.nz) or contacted via WWCC, P O Box 4476, Christchurch.

Thank you for the opportunity to make this submission.



Graeme Wilson  
Vice President  
Whitewater Canoe Club