

SUBMISSION ON THE PROPOSED REGIONAL LAND AND WATER PLAN

**UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE
RESOURCE MANAGEMENT ACT 1991**

Please note that submissions are required to be received by the West Coast Regional Council no later than **5.00 pm, Friday 15 October 2010.**

To: Chief Executive Officer
West Coast Regional Council
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GREYMOUTH 8470
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Submission On: Proposed Regional Land and Water Plan

Name: Whitewater NZ

Address: PO Box 284, Wellington
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1. The specific provisions of the Proposed Plan that my submission relates to are as follows:

- Section 4
- Section 6
- Section 7
- Section 8
- Section 9
- Rule 21
- Rule 51
- Rule 56
- Rule 57
- Section 19
- Schedule 5
- A general comment

2. My submission is that:

About Whitewater New Zealand

1. Formed in 1957, Whitewater NZ is the national representative organisation of canoe clubs and recreational kayakers throughout New Zealand. Whitewater NZ is a voluntary, non-profit, incorporated society and is affiliated to the NZ Canoe Federation. The NZCF is in turn affiliated to the International Canoe Federation. Whitewater NZ has delegated authority to represent the NZCF and all its member disciplines on advocacy issues.

2. Whitewater NZ was known as the New Zealand Recreational Canoeing Association until July 2009, and before that as the New Zealand Canoe Association until 1995/6. At this time the competitive canoeing disciplines were spun off into their own associations, the new umbrella body the NZ Canoe Federation was formed, and the NZCA renamed itself to the NZ Recreational Canoeing Association to reflect its non-competitive advocacy role.

3. Whitewater NZ represents both club and individual members and further associated clubs. At time of writing there are 24 full member clubs with a combined membership of around 1000 kayakers, the largest of which is Whitewater Canoe Club with approximately 200 members. There are also 90 members who have joined individually. Another 30 organisations representing over 1200 kayakers are associate members. Associate members generally choose to support Whitewater NZ on specific issues; e.g. the largest, Arawa Canoe Club with 430 members, paid all of Whitewater NZ's legal costs during the Central Plains Water hearing.

4. The combined total of around 2,300 full and associate member kayakers in no way adequately represents the sum total of kayakers in New Zealand, as there are many who do not belong to clubs, and who have not joined Whitewater NZ as individuals

Submission

My name is Tony Ward-Holmes. I am Conservation Officer for Whitewater NZ, and comment on behalf of all NZ kayakers. The following submission is based on that of Andrew England, a prominent local kayaker and co-opted officer of Whitewater NZ. The elected officers of Whitewater NZ concur with the submission.

I SUPPORT the concept of bringing together all such policies and plans in one document, ie the Land and Water Plan. I SUPPORT the general identified protection measures for Lake Brunner. I OPPOSE certain sections and rules as detailed below. I SUGGEST that more use is made of available relevant data including but not limited to the notes from Development West Coast led Renewable Energy Strategy, Lincoln University's document linked to WCRC on whitewater kayaking on the West Coast, and Andy England's work supported by the Royal Society of New Zealand.

I recognise that most of the whitewater sections of rivers are on Department of Conservation land, but there are principles that I believe could and should be included in the Land and Water Plan.

Section 4

I support this section.

Section 6

I support sections 6.1 and 6.2. and Policy 6.3.1 "Existing public access to and along ...rivers" should adequately protect kayaking/canoeing/rafting (hereafter all referred to as 'kayaking').

Policy 6.3.2 needs further work, in my opinion: "significant community benefits (locally and nationally)" does not define or reference "significant"; furthermore, local and national benefits may oppose one another, for example where a local rafting company profits from use of a river that a national company may wish to use to export generated hydro power. In general, it would seem foolish to suggest from the outset that mitigation may be unnecessary when profit may be gained from a development.

6.3.6 is fine as is.

6.3.7 as policy is fine by me, but I would like to see the word 'kayaking' or similar ('boating' would cover kayak to jetboat) specifically mentioned.

6.3.8 I see as problematic, given the limited knowledge of recreational use of water bodies (as evidenced by the Cobden Beach sand mining debate). It is likely that good knowledge will be held on a water body's natural characteristics but unlikely that such knowledge extends to the full range of cultural or social uses of a water body. "Minor adverse effects" needs to be clarified or referenced.

Section 7

7.2.1 reads well, but I would like to see commitment to preserving the "natural character" as a priority. 7.2.2 could do with more clearly stating the balance that this text, to me, describes. This one statement covers a lot of issues, of competing demands for water use: for example, minimum flows for a rafting company may compete with water extraction for hydro generation. What outcome does this statement (7.2.2) suggest? I support the inclusion of "future users" but again point to ambiguity (which serves my purpose as well as any other).

Section 8

I support the inclusion of policies to maintain and improve water quality.

Section 9

I support the identification of Lake Brunner as having special status as this lake exemplifies water use conflict in a very obvious way: Lake Brunner needs to be a clean and attractive destination and it needs to have reduced downstream pollution.

Rule 21

With regard to (f): on occasion, such as Ten Mile bridge currently, sites can be left "tidy" but still contain potentially fatal hazards to rivers users, such as metal reinforcing rods in the river. Could a phrase be added here, and in all such phrases repeated, to include safety to river users, such as "the site is left tidy without additional hazards for river users on completion of the work"? Alternatively, "tidy" could be clarified to include such a concept.

Rule 51

I do NOT think that "the damming, taking, use, discharge or diversion of water" should be a discretionary activity. This is particularly the case where the WCRC may not have a complete knowledge of the significance of a water body to users (see note under Schedule 5).

I do NOT agree that "any financial contribution" should be taken into account in consideration of discretionary activities – if financial contributions are great enough to influence decisions, an application should be notified.

I AGREE that dams in Schedule 11 should be exempt from renegotiation of conditions SO LONG as there are not complaints about the applicant's conduct under existing conditions. Where complaints have been made to the WCRC and upheld, I think applicants should or could be expected to reapply.

Rule 56

As above, I do not think that damming of a water body should be a discretionary activity except under the circumstances outlined in Rule 47 (permitted activity).

Rule 57

As above, I think that hydro electric generation needs a permitted activity description, such as that for damming, that permits micro hydro for small scale domestic use, and no discretionary activity status (so that affected parties are always notified).

Section 19

I support the outline of information required by applicants. It may be useful to suggest sources of information for activities that could be affected.

Schedule 5

I accept that kayaking, canoeing and rafting are covered by the phrase "human use values are not limited to those characteristics identified in this schedule" BUT I point out:

A That West Coast rivers are well known as a destination for kayakers: I have lots of data from my study "the significance of West Coast rivers to whitewater kayakers" that could be referenced

B WCRC staff, Simon Moran, took part in a Lincoln University-led project "Prioritising River Values" on 10 Oct 2009. The resulting document (Booth, 27 Oct 2009) offers some basic explanation of the values of rivers on the West Coast to kayakers.

Whilst all this data would not be required or appropriate in the Land and Water Plan, specific reference to the significance of the West Coast rivers to kayaking should be made along with reference to sources of further information.

The Renewable Energy Strategy Forum in Greymouth, hosted by DWC but perhaps suggested by WCRC (Ingle, in minutes of meeting ????) focused largely on hydro generation so has relevance to the Land and Water Plan:

1. There was widespread support from across all interests represented for generating hydro power to meet regional needs to a certain projection, but NOT primarily for export. This concept could inform the relevant sections of the Land and Water Plan. There was also preference for local generation schemes where possible;
2. There was clear acceptance that lifestyle choices by many West Coast residents mean that river environments for recreation and conservation carry a social and economic value.

I am concerned that WCRC does not make use of the full range of available data to inform its planning, such as I saw at HBRC and TDC, and I would like to suggest that further data is sought to be incorporated in the Land and Water Plan.

3. I seek the following decision from the West Coast Regional Council:

Specific points have been made in the previous section.

4. I do wish to be heard in support of my submission.

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

.....Tony Ward-Holmes.....
*[Signature of person making submission or
person authorised to sign on behalf of person
making submission]*

.....15/12/2010.....
[Date]

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person making submission:

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