



Ashburton District Council

c/o [submissions@adc.govt.nz](mailto:submissions@adc.govt.nz)

## **SUBMISSION ON ASHBURTON DISTRICT LONG-TERM PLAN 2021-2031**

FROM: CENTRAL SOUTH ISLAND FISH AND GAME COUNCIL

Contacts: Central South Island Fish and Game Council  
c/o Angela Christensen, Resource Officer

### **Fish and Game Councils are Statutory Bodies with Functions (*inter alia*) to:**

*'manage, maintain, and enhance the sports fishery and game resource in the recreational interests of anglers and hunters ....*

*'to maintain and improve the sports fish and game resource by maintaining and improving access; ...*

*'In relation to planning, -*

*To represent the interests and aspirations of anglers and hunters in the statutory process, ... and*

*'To advocate the interests of the Council, including its interests in habitats:...*

### **Section 26Q, Conservation Act.**

Central South Island Fish and Game Council (CSIFG) have an interest in the Long-Term Plan (LTP) and the programmes that it supports as they relate to the matters above and as defined by our statutory responsibilities. CSIFG is also a ratepayer in the district. There are several projects in the LTP that have an impact on our values and interests as they relate to the sports fish and game bird resource and their habitats. CSIFG wishes to thank Ashburton District Council (ADC) for the opportunity to lodge a submission and looks forward to working with ADC going forward to achieve the environmental outcomes envisaged by the LTP.

*Statutory managers of freshwater sports fish, game birds and their habitats*

**Central South Island Region**

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ADC has set out a number of infrastructure service projects over the next decade to address drinking water, wastewater, and stormwater. The Three Waters Reform Programme is an integral system-wide reform to meet and achieve drinking water safety standards and to meet environmental expectations through efficient and effective wastewater and stormwater systems. These systems must meet the existing and future challenges of climate change and uphold the fundamental concept of Te Mana o te Wai. Whilst the future is unknown in terms of the role that ADC will play in the delivery of three waters services, continuing work towards more efficient systems to achieve environmental and human health outcomes is critical.

The inefficient water delivery systems in place within the district must be addressed. ADC estimates losses of up to 50% of water from the current system. The use of drinking water meters is supported by CSIFG to inform where inefficiencies may be.

Furthermore, the stockwater network must also be a priority. Both leakage in the races and evapotranspiration make water transport in this manner inefficient. Policy 13.4.1 of the Canterbury Land and Water Regional Plan (LWRP) directs

*In order to increase the amount of water in the river that is available to meet the proposed increased minimum flows, the taking of water for community stock water supplies from the Ashburton River/Hakatere will progressively decrease so that as soon as possible, but by no later than 1 July 2023, that taking will not exceed 2,900 l/s in total.*

CSIFG acknowledges that some races will have high biodiversity values; however, a number of races may not. CSIFG supports the piping of supply schemes to gain efficiencies, minimise losses and to return water to the Ashburton River. Stockwater should not be used for any other activity and CSIFG opposes stockwater going to any other use prior to the minimum flows set down in the LWRP for 2023 and 2033 being met.

CSIFG supports additional resources to increase ADC's capability in biodiversity. ADC has a specific function under s31 RMA for "the maintenance of indigenous biological diversity." In order to undertake this important work, ADC must be resourced adequately. ADC highlighted in its submission on the proposed National Policy Statement- Indigenous Biodiversity (NPS-IB) the resources required to implement the NPS-IB. Whilst the NPS-IB is not yet operative, it is expected to become operative later this year. CSIFG seeks that ADC has adequate resources to employ qualified ecologists to carry out what is required under the NPS-IB. The high country of the district is significant and has myriad values including cultural, recreational, and environmental. It is important that SNAs are identified as a matter of urgency to avoid any further losses. Additionally, monitoring and enforcement of consents is critical to ensure protection of these valuable areas.

The community outcome related to biodiversity "A balanced & sustainable environment" measures success as:

- Resident satisfaction with the state of the district's environment and biodiversity
- Resident satisfaction with Council's activity to care for the district's environment and biodiversity

Whilst gauging the satisfaction of ratepayers is an important tool to measure Council's success, resident satisfaction must not be the only measure of meeting Council's requirements under the RMA and the anticipated NPS-IB. Meaningful measures could also include beginning to undertake a district wide assessment to determine the presence of significant indigenous vegetation/habitat of indigenous fauna and mapping of these areas. This would go some way in giving effect to the proposed policies of the NPS-IB and meeting ADC's obligations under s31 RMA.

CSIFG does not wish to be heard and appreciates consideration of this submission in its entirety.