

Tamina Roberts

From: Annette Hamblett <ahamblett@xtra.co.nz>
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Subject: TRIM: Submission on Proposed Variation 1 to the Canterbury Land and Water Regional Plan
Attachments: Submission%20on%20Proposed%20Variation%201Proposed%20Variation%20a%20to%20Proposed%20CanterburySubmission on Selwyn Waihora var
Follow Up Flag: Follow up
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Submission attached

Submission on Proposed Variation 1 to the Canterbury Land and Water Regional Plan

Submitters

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Our comments

- It is of serious concern that this variation allows for further decline in water quality below the current status quo. All efforts should be made in policies and rules to improve water quality as soon as possible. We note that this variation comes across as having an economic basis rather than an environmental one. This is incompatible with the fundamental principles of the Canterbury Water Management Strategy as the environment is a first order priority consideration and irrigation is a second order priority consideration.
- As the variation stands, the Selwyn Waihora Zone will not meet all the targets in its ZIP.
- While we see some positive paths in this variation, we are concerned that water quality and minimum flows in this zone will be getting worse than they are currently before they are supposed to get better some years down the track. This is as a consequence of many consents that are not due for renewal until 2030 and minimum flow improvements being delayed until 2025.
- Putting a heavy reliance on land managers in the zone consistently using good management practices to achieve the desired results is risky. We can see that may be open to abuse/manipulation.
- Rigorous independent monitoring is essential for achieving targets and this should be emphasized. We note there is an overall lack of detail on monitoring. Monitoring for periphyton is not included and should be.
- A more detailed timeframe is required and more milestones.
- The plan does not cover how costs will be recovered. We want to see costs recovered on a user-pays basis.
- We note that while cultural and environmental considerations can overlap, they are not the same thing. There is detail on cultural aspects; there needs to be more detail on how environmental aspects are being covered.
- Optimum levels for mudfish are not addressed and need to be.
- Inanga spawning needs should be addressed specifically. They are not even mentioned in this document. They need to be included.
- Recreational needs are not adequately protected and enhanced and need to be.
- We are concerned that nitrogen toxicity levels for the lowland areas of the zone are very high but this is not addressed. It needs to be.
- There are specific flow and N limits for Te Waihora but not the main rivers or their tributaries (11.4.1) Flow and N limits need to be stated for the main rivers and their tributaries.
- We support the provisions here for improvements including excluding stock from drains (11.4.12).

- The leaching level of 80kg N/ha by 2037 is too high with such a long timeframe (11.4.16). It needs to be addressed.
- 11.4.20. This policy is problematic if there is didymo present in the water used to augment flows. We want the plan to include provision to address this.
- We support protecting the ecological health of the Selwyn River and other lowland streams (11.4.28) but want to see this speeded up for existing consented users. We also want the plan to note how dry years will be addressed.
- 11.4.31. We want to see this policy encompass the mainstems of the Selwyn/Waikirikiri and the Waiāniwaniwa rivers and their tributaries, as well as significant sites for mudfish in the Waiāniwaniwa that aren't in the mainstem (to be identified by the Dept of Conservation).
- 11.4.32 e,f,g,h. We support the inclusion of provisions to protect Rakaia and Waimakariri river water.

Rules

We want to see maximum N discharge levels for 2037 improved.

11.5.14. What happens when a farm manager within an irrigation scheme breaches the rules is not addressed.

There do not appear to be limits set for P. This needs to be addressed in the plan.

Transfers of water permits: As the Selwyn Waihora Zone is an over-allocated catchment we think transfers should be prohibited. We want to see the plan state this.