

## Gay Gibson

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**From:** Maree Baker-Galloway <maree.baker-galloway@andersonlloyd.co.nz>  
**Sent:** Monday, 9 June 2014 3:56 p.m.  
**To:** Mailroom Mailbox  
**Cc:** Sarah Eveleigh  
**Subject:** TRIM: V1 pLWRP Further Submission  
**Attachments:** Central South Island Fish and Game Further Submission Variation 1.pdf;  
ALD-388879-30-2122-15 Further submission on Variation 1 to the LWRP.docx

**Categories:** Purple Category  
**HP TRIM Record Number:** C14C/91768

We act for Central South Island Fish and Game Council

Please find attached PDF (signed) and Word (unsigned) versions of CSI Fish and Game's further submission.

Yours faithfully

Maree Baker

**Maree Baker-Galloway**  
**Partner Owner**

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

To: Variation 1 to the Proposed Canterbury Land and Water Regional Plan  
Environment Canterbury  
Freepost 1201  
P O Box 345  
Christchurch

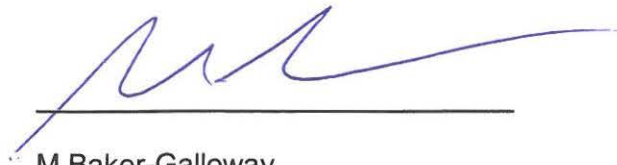
Submitters Name: Central South Island Fish and Game

Address for service: C/- Anderson Lloyd Lawyers  
P O Box 1959  
Dunedin 9054  
Attn: Maree Baker-Galloway

Email: maree.baker-galloway@andersonlloyd.co.nz  
Phone: 03 477 3973  
Fax: 03 477 3184

1. This further submission is filed by Central South Island Fish and Game in response to submissions made in respect of Proposed Variation 1 to the Canterbury Land and Water Regional Plan. The further submissions are outlined in Annexure 1.
2. Central South Island Fish and Game represent a relevant aspect of the public interest; and have an interest in the proposal greater than the interest the general public has.
3. In addition to the below further submission points, the original submission of Nelson Marlborough, North Canterbury and Central South Island Fish and Game (submitter number 357) is supported in full as it relates to Variation 1, in particular, but not limited to:
  - a. Objectives protecting the quality of outstanding water bodies
  - b. Identification of values of water bodies in the process of setting freshwater objectives
  - c. The setting of freshwater objectives sufficient to give effect to the NPS Freshwater Management and Part II of the RMA
  - d. The setting of limits (and targets) sufficient to achieve the freshwater objectives identified, and sufficient to protect life supporting capacity and ecosystem processes.
  - e. An objective, policy and rule framework that provides certainty that in over allocated catchments discharges/allocation will be reduced, degraded water quality restored and targets met within a set timeframe.
  - f. Where there are permitted discharge rules, they are in accordance with section 70, and are sufficiently certain as to be valid.

4. Central South Island Fish and Game wishes to be heard in support of its submission and if others make a similar submission would consider presenting a joint case with them at the hearing.



M Baker-Galloway  
Counsel for Central South Island Fish and Game

Dated 9 June 2014

## ANNEXURE 1

Submitter	Sub ID	Parts of the submission supported or opposed	Reasons	Support / Oppose
Christchurch City Council	52285	V1pLWRP-934	Amendments to stock access rule 5.69 gives effect to the Act	Support
Christchurch City Council	52285	V1pLWRP-935	Amendments to vegetation and water body rule 5.164 give effect to the Act	Support
<b>Policies</b>				
North Canterbury Fish and Game	52310	V1-pLWRP- 661	New Policy gives effect to the NPS Freshwater Management and Part II of the RMA	Support
Royal NZ Forest and Bird Protection Society	52265	V1-pLWRP-1261	New Policy is consistent with the necessity to identify the values of freshwater bodies, in order to then set objectives and limits	Support
North Canterbury Fish and Game	52310	V1-pLWRP-643	Amended policy 11.4.1 is appropriately inclusive	Support
Ellesmere Irrigation Society	52210	V1-pLWRP-472	Amended policy 11.4.6 makes it clear that total load must be reduced, and therefore gives better effect to the NPS Freshwater Management requirement to improve degraded water quality. However deletion of last words of policy are not supported.	Support in part
North Canterbury Fish and Game	52310	V1-pLWRP-648	Limits/targets set to which policy 11.4.6 refers do not give effect to the NPS Freshwater Management	Support
North Canterbury Fish and Game	52310	V1-pLWRP-651	Limits/targets set to which policy 11.4.8 refers do not give effect to the NPS Freshwater Management	Support
North Canterbury Fish and Game	52310	V1-pLWRP-653	Limits/targets set to which policy 11.4.9 refers do not give effect to the NPS Freshwater Management	Support
North Canterbury Fish and Game	52310	V1-pLWRP-659	Limits/targets set to which policy 11.4.10 refers do not give effect to the NPS Freshwater Management	Support
North Canterbury Fish and Game	52310	V1-pLWRP-660	Limits/targets set to which policy 11.4.11 refers do not give effect to the NPS Freshwater Management	Support
Jane Demeter	52312	V1-pLWRP-1017	Policy 11.4.12 should require more than just reliance on farm plans and good practice to ensure reduction in contamination in over allocated catchment.	Support

Nth Canterbury Federated Farmers	52318	V1-pLWRP-847	Proposed wording for 11.4.12 gives better effect to the NPS Freshwater Management in terms of providing certainty contamination will be reduced and water quality improved.	Support in part
North Canterbury Fish and Game	52310	V1-pLWRP-663	Policy 11.4.13 goes some way to giving effect to the NPS Freshwater Management, but needs to provide more certainty in order to completely give effect to it.	Support in part
Nth Canterbury Federated Farmers	52318	V1-pLWRP-318	Proposed wording for 11.4.13 gives better effect to the NPS Freshwater Management in terms of providing certainty contamination will be reduced and water quality improved.	Support in part
Irrigation NZ	52278	V1-pLWRP-1057	Reliance on undefined term "good management practice..." is uncertain and does not give effect to the NPS Freshwater Management	Support in part
Dougal Smith	52195	V1-pLWRP-1114	Reliance on undefined term "good management practice..." is uncertain and does not give effect to the NPS Freshwater Management	Support in part
North Canterbury Fish and Game	52310	V1-pLWRP-664	Policy 11.4.14 provides certainty over allocation will be reduced and water quality eventually improved, however targets are not sufficient to give effect to the NPS Freshwater Management	Support in part
Dougal Smith	52195	V1-pLWRP-1114	Reliance on undefined term "good management practice..." is uncertain and does not give effect to the NPS Freshwater Management	Support in part
North Canterbury Fish and Game	52310	V1-pLWRP-665	Effectiveness of policy 11.4.15 in combination with insufficient targets fails to give effect to NPS Freshwater Management	Support in part
North Canterbury Fish and Game	52310	V1-pLWRP-665	Effectiveness of policy 11.4.16 in combination with insufficient targets fails to give effect to NPS Freshwater Management	Support in part
<b>Rules</b>				
Federated Farmers	52318	V1-pLWRP-860	Added condition, for rule 11.5.9 provide certainty that nitrogen discharges will be reduced, which better gives effect to the NPS Freshwater Management than the previous reliance on a matter of discretion. However reference should be retained to the appropriate policies 11.4.14 and 15	Support in part
Federated Farmers	52318	V1-pLWRP-861	Policy reductions are appropriate	Support in part

<b>Schedule 24</b>				
Balance Agri-Nutrients	52309	V1-pLWRP-777	Changes to Schedule 24 improve quality control and certainty	Support
Royal Forest and Bird Protection Society	52265	V1-pLWRP-1333 and 1334	Schedule 24 and suggested changes consistent with certainty and quality control	Support
<b>Freshwater Objectives Table 11 (a)</b>				
Medical Officer of Health	52266	V1-pLWRP-1245	Objectives sought by submitter will give better effect to the NPS Freshwater Management and part II RMA	Support
<b>Limits/targets tables</b>				
North Canterbury Fish and Game	52310	V1-pLWRP-712	Limits set in table 11 (k) will not protect life supporting capacity or ecosystem processes and will not give effect to the NPS Freshwater or Part II of the RMA	Support
Doug Rankin	52319	V1-pLWRP-1145	Allowing for further degradation in an overallocated catchment would be a breach of the NPS Freshwater Management	Support

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

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Environment Canterbury  
Freepost 1201  
P O Box 345  
Christchurch

Submitters Name: Central South Island Fish and Game

Address for service: C/- Anderson Lloyd Lawyers  
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