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Subject: Variation 4 submission attached
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Attachments: [Var 4 submission Jane Demeter.doc](#)

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SUBMISSION ON THE PROPOSED LAND AND WATER REGIONAL PLAN

Prepared under the Resource Management Act 1991

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This is a submission on the proposed Variation 4 to Canterbury and Water Regional Plan as notified on the 12 September 2015.

1. **Inanga Spawning Sites - Support in part**

"Known Spawning Sites^a

The Inanga Spawning Site includes a protection zone, 20 metres in diameter, around the specified co-ordinates Listed in the table below. Note the protection zone does not extend to any land that is outside the bed or banks of a lake, river or wetland".^a*

1.1 I support the modelling approach to identify likely spawning habitat but feel the current proposal is does not go far enough to protect the potential spawning locations of these in-decline species. Has the modelled data been ground-truthed against the measured salt wedge in these estuaries?

1.2 **Relief sought**

Add additional 10m upstream and 10m downstream of proposed area margins to accommodate likely salt wedge location changes due to hapua and river mouth morphology variances along with anticipating the potential effects of sea level changes in the future.

All exclusion periods should start 1 Jan rather than 1 Mar.

2. **Discharge of Contaminants to land and or water - Support**

2.1 Support any measures that maintain water quality

2.2 **Relief sought**

Retain proposed wording in 4.13 (e) i and ii, 4.14B also 4.16A

3. **Protect Sources of Drinking Water - Support**

3. Community drinking water supplies need more protection from other water take and use permits.

3.1 **Relief sought**

Retain proposed wording in 4.23A and 4.23 B:

4. **Livestock exclusion from Waterbodies - Support**

4.1 **Relief sought**

Retain proposed wording changes in 4.31

5. **Activities in Beds of Lakes and Rivers - Support**

5.1 4.85A, 4.86A, 4.86B proposed changes may need to include more protections.

5.2 **Relief sought**

Retain proposed wording 4.85A, 4.86A, 4.86B. Add more protections.

6. **Fine Sediment removal and Habitat Restoration - Support**

6.1 **Relief sought**

Retain proposed wording 4.92A

7. **Stock Exclusion - Support in part**

Proposed provisions provide little protection for the needed riparian vegetation buffer. 50m is inadequate in some cases of significant indigenous vegetation and where specialised river-bird species need the intact river turfs.

- 7.1 **Relief sought**
Change 5.68A (1) ii from 50 m to text that better reflects the variable nature of the needed intact buffer zone. This may require an ecological survey.
8. **5.71 Use and disturbance of the bed - Support in part**
- 8.1 A buffer zone is needed beyond the inanga spawning site. There is no provision of protection for nesting river-birds.
- 8.2 **Relief sought**
Insert "within 10m of the inanga spawning habitat"
Insert additional clause: "Disturbance shall not occur within 100 metres of birds which are nesting or rearing their young in the bed of the river."
9. **Industrial and Trade Waste - Support in part**
- 9.1 As notified there is no consideration of the nature of the contaminants in the waste.
- 9.2 **Relief sought**
Add a clause to 5.91 that indicates contaminants that are acceptable or unacceptable.
10. **Bores - Support**
- 10.1 5.109 3 Community Drinking water supplies need protection.
- 10.2 **Relief sought**
Retain 5.109 3.5 as worded.
11. **Fine Sediment Removal from Rivers - Support**
Support 5.146A and 5.146B.
- 11.1 **Relief sought**
Retain 5.146A and 5.146B as worded
12. **Dams and Damming - Support in part**
- 12.1 5.154 has no provision for the inundation of nests of river birds
- 12.2 **Relief sought**
Add 5.154 2 (h) "The damming does not inundate the nests of any nesting river-birds."
13. **Vegetation in Lakes and Riverbeds - Support in part**
- 13.1 **Relief sought**
Add 5.163 11: "Vegetation is not removed from any areas of significant indigenous vegetation."
14. **Earthworks and Vegetation Clearance in Riparian areas, Erosion Prone Areas, and Burning of Vegetation - Support in part**
- 14.1 No provision is made for retaining areas of significant indigenous vegetation
- 14.2 **Relief sought**
Add to 5.167, 5.168, 5.170, 5.171, and 5.174. "The vegetation clearance is not in any area of significant indigenous vegetation".
"Nesting river-birds are not located within 100m of the activity"
15. **Contaminated Land - Support in part**
- 15.1 Surely there needs to be some knowledge of what the contaminants are in the passive discharge?
- 15.2 **Relief sought**
5.187 Add a clause re contaminant identification needed with subsequent actions

General

16. I wish to be heard in support of my submission.
17. I would be prepared to consider presenting a joint case with others making a similar submission at any hearing.

12 October 2015