

From: [Erika Toleman](#)
To: [Mailroom Mailbox](#)
Cc: hfamilyton@doc.govt.nz; spearson@fishandgame.org.nz; lhume@fedfarm.org.nz; [Jennifer Miller](#)
Subject: PC4 pLWRP Further Submission
Date: Monday, 16 November 2015 4:12:16 p.m.
Attachments: [Forest & Bird further submission Canterbury LWP Variation 4.pdf](#)

Good afternoon all,

Please find attached, for filing and service, a further submission on behalf of the Royal Forest & Bird Protection Society of NZ Incorporated on Plan Change 4 to the LWRP.

Kind regards,

Erika Toleman

SOLICITOR

Royal Forest and Bird Protection Society of New Zealand Inc.

Level 1 . 90 Ghuznee St . PO Box 631 . Wellington . New Zealand

DD 04 801 2218 **M** 021 988 315 **F** 04 385 7373

RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 4 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

To: Environment Canterbury

Submitted by email to mailroom@ecan.govt.nz

From: Royal Forest and Bird Protection Society of New Zealand Incorporated of New Zealand
(Forest & Bird)

Address for service:

Forest and Bird
PO Box 2516, Christchurch 8140
Attention: Jen Miller

Email: j.miller@forestandbird.org.nz Phone: 03 940 5523

INTRODUCTION

1. Forest & Bird represents a relevant aspect of the public interest, and has an interest greater than the public generally.
2. Forest & Bird wishes to be heard in support of this submission, and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.
3. Forest & Bird is New Zealand's largest non-governmental conservation organisation with 70,000 members and supporters. Forest & Bird originally set out to protect New Zealand's unique flora and fauna the tasks of Forest and Bird in more recent years has extended to protecting and maintaining the environment surrounding the flora and fauna. Establishing wildlife reserves, initiating protection campaigns and promoting general public awareness around what is happening in and around New Zealand is all central to Forest & Bird's establishing principle of flora and fauna protection.

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Reasons	Support or oppose submission point
Director General of Conservation Attn: hfamilyton@doc.govt.nz	Rules 5.77 and 5.78	Reasons outlined in DOC submission	Support
	Rule 5.123	Reasons outlined in DOC submission	Support
	Rule 5.148	Reasons outlined in DOC submission	Support
	Rules 5.163 to 5.166	Reasons outlined in DOC submission	Support
	Schedule 5	??	
	Schedule 8	Reasons outlined in DOC submission	Support
	Schedule 9	??	
	Schedule 17	Reasons outlined in DOC submission	Support
	Proposed maps	Reasons outlined in DOC submission	Support
North Canterbury Fish and Game Attn: spearson@fishandgame.org.nz	Entire submission	Reasons outlined in Fish & Game submission	Support

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Reasons	Support or oppose submission point
Combined Canterbury Provinces, Federated Farmers of New Zealand Attn: lhume@fedfarm.org.nz	Earthworks definition	F&B supports the 5 September 2015 date. As per primary submission, definition of earthworks (and vegetation clearance) should not allow adverse effects on biodiversity and water quality.	Oppose in part
	Inanga Spawning Habitat definition	Agree that 'Inanga Spawning Sites' needs to be defined, but disagree with any weakening of the provisions protecting Inanga Spawning Sites and Habitats. Do not agree that definition should be limited to 'natural lakes'.	Oppose in part
	Vegetation clearance definition	As per primary submission, this definition should not allow adverse effects on biodiversity, and therefore needs to be more tightly defined.	Oppose in part
	Policy 4.13(e)		Oppose
	Policy 4.31	Amendments sought weaken policy protection for Inanga.	Oppose
	Policy 4.85A	Policy (with amendments sought in F&B primary submission) appropriate.	Oppose

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Reasons	Support or oppose submission point
	Policy 4.86A	As per F&B primary submission	Oppose
	Rule 5.68A	Rule is appropriate as proposed, with amendment as per Fish & Game submission point.	Oppose
	Rule 5.68 3.(c)	See F&B primary submission.	Oppose
	Rule 5.71	Rule is appropriate as proposed.	Oppose
	Rule 5.123 and 5.128	The rules are concerned with broader effects than efficient and effective use of water on-farm (e.g. matters of discretion include effects on significant biodiversity). The condition as proposed is appropriate.	Oppose
	Rule 5.154		Oppose
	Rules 5.163 and 5.167 (condition 7)	Condition appropriate as notified	Oppose
Rules 5.163 (condition 10)and 5.167 (condition 2A)	Agree that may be difficult for plan user to ascertain in advance whether this condition would be met. However, the issue of sediment needs to be dealt with by the rules, and simply deleting the condition will not achieve this. An alternative is to make any activity that is likely to cause sediment to enter waterways a	Oppose in part	

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Reasons	Support or oppose submission point
		discretionary activity, so that a proper assessment of effects can be carried out.	