

From: [Kirsty Huxford](#)
To: [Mailroom Mailbox](#)
Subject: Ngai Tahu further submission PC4 LWRP
Date: Tuesday, 17 November 2015 12:25:53 p.m.
Attachments: [Ngai Tahu Further submission PC4 LWRP.pdf](#)

Kia ora

Please find attached a further submission on *Plan Change 4 – Land and Water Regional Plan* from nga runanga (Te Runanga o Kaikoura, Te Ngai Tuahuriri Runanga, Te Hapu o Ngati Wheke, Te Runanga o Koukourarata, Onuku Runanga, Wairewa Runanga, Te Taumutu Runanga, Te Runanga o Arowhenua, Te Runanga o Waihao, Te Runanga o Moeraki) and Te Runanga o Ngai Tahu. You have allocated us Submitter ID Number 65933.

Nga mihi

Kirsty

Kirsty Huxford | Senior Environmental Advisor | Tribal Interests |

Te Runanga o Ngai Tahu | Te Whare o Te Waipounamu | 15 Show Place, Addington |

PO Box 13 046 | Christchurch 8141 |

Imera: kirsty.huxford@ngaitahu.iwi.nz | Waea: 03 974 0076 | Waea Pukoro: 021 590 263 |



Te Rūnanga o Ngāi Tahu



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Te Rūnanga o NGĀI TAHU

Form 6

Clause 8 of the First Schedule of the Resource Management Act 1991

**FURTHER SUBMISSION ON PLAN CHANGE 4:
CANTERBURY LAND AND WATER REGIONAL PLAN**

17 November 2015

To: Plan Change 4 to LWRP
Environment Canterbury
PO Box 345
Christchurch 8140
Submission lodged by email – mailroom@ecan.govt.nz

Name of person making submission:

- **Ngā rūnanga** (Te Rūnanga o Kaikōura, Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, Te Rūnanga o Moeraki); and
- **Te Rūnanga o Ngāi Tahu** (Te Rūnanga).

We have been allocated Submitter ID Number 65933 (your reference).

These are further submissions in support or opposition to submissions on: Proposed Plan Change 4 – Canterbury Land and Water Regional Plan.

We are a representing a person who has an interest in the proposal that is greater than the general public has.

Introduction and Background

Ngai Tahu is Tangata Whenua of the Canterbury region. Ngāi Tahu means “people of Tahu” and is the iwi comprised of Ngāi Tahu Whānui - the collective of the individuals who descend from the five primary hapū; Ngāti Kuri, Ngāti Irakehu, Kati Huirapa, Ngāi Tūāhuriri and Ngāi Te Ruahikihiki. The Ngāi Tahu takiwā includes over 80 per cent of Te Waipounamu, which has been home to Ngāi Tahu for over 800 years.

Te Rūnanga o Ngāi Tahu (Te Rūnanga) is statutorily recognised as the representative tribal body of Ngāi Tahu Whānui under the Te Rūnanga o Ngāi Tahu Act 1996 (the Act).

Te Rūnanga o Ngāi Tahu
15 Show Place, Addington
PO Box 13-046, Christchurch, New Zealand
Phone + 64 3 366 4344, 0800 KAI TAHU
Email: info@ngaitahu.iwi.nz
Website: www.ngaitahu.iwi.nz

We note for Canterbury Regional Council the following relevant provisions of our constitutional documents:

Section 3 of the Act States:

“This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provisions of this Act.”

Section 15(1) of the Act states:

“Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.”

The Charter of Te Rūnanga o Ngāi Tahu constitutes Te Rūnanga as the kaitiaki of the tribal interests. Te Rūnanga respectfully requests that Canterbury Regional Council accord this response the status and weight due to the tribal collective, Ngāi Tahu Whānui, currently comprising over 55,000 members, registered in accordance with section 8 of the Act.

Notwithstanding its statutory status as the representative voice of Ngāi Tahu Whānui “for all purposes”, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses in relation to this matter.

It should be noted that Section 15(2) of the Act states that where any enactment requires consultation with any iwi or with any iwi authority, that consultation shall, with respect to matters affecting Ngai Tahu Whānui, be held with Te Rūnanga o Ngai Tahu. Section 15(3) of the Act requires that in carrying out any consultation Te Rūnanga o Ngāi Tahu shall in turn consult with Papatipu Rūnanga. In practice, Te Rūnanga takes into account the views of Papatipu Rūnanga when determining its position. In the case of issues of local significance only, Te Rūnanga may defer a response completely to Papatipu Rūnanga.

Papatipu Rūnanga are defined in section 9 of the Act. This includes Te Rūnanga o Kaikōura, Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki.

We support or oppose the submission points set out in Schedule One.

The reasons for our support or opposition are also set out in Schedule One.

We seek that the submissions supported in Schedule 1 be allowed.

We seek that the submissions opposed in Schedule 1 be disallowed.

We DO wish to be heard in support of our further submission.

**Signature of person (s) making further submission
(or person authorised to sign on behalf of person (s) making further submission)**



**James Caygill
General Manager, Tribal Interests
Te Rūnanga o Ngāi Tahu**

Date: 17 November 2015

Address for service:

Kirsty Huxford
Te Rūnanga o Ngāi Tahu
PO Box 13 046
Christchurch 8021

Email: kirsty.huxford@ngaitahu.iwi.nz

Phone: 03 974 0076

SCHEDULE 1

Submitter	#	Plan Provision	Relief sought / issue raised by submitter	Ngāi Tahu Position	Reason
Mackenzie District Council	328, 331	2.9 Definitions – Group drinking water supplies and community drinking water supplies	Delete all amendments to group drinking water supplies or community drinking water supplies within PC4	Support in part	Agree that group drinking water supplies supplying fewer than 25 people should be protected under the plan.
Kaikoura District Council	481	2.9 Definitions, Translations and Abbreviations	Amend PC4 to ensure marae are provided with same level of protection as community drinking water supplies as outlined in Schedule 1 of Land and Water Regional Plan.	Support	Support protection of group drinking water supplies that may include, but is not limited to, marae. Ngāi Tahu seeks protection for group drinking water supplies that supply more than one household but fewer than 25 people - refer to Ngāi Tahu submission for further detail.
Ellesmere Sustainable Agriculture Inc	31	2.9 Definitions, Translations and Abbreviations	Delete the definition of 'Inanga Spawning Habitat.'	Oppose	Inanga are a taonga species and should be protected – however refer to Ngāi Tahu submission for requested amendment to definition.
Trustpower Limited	78	2.9 Definitions, Translations and Abbreviations	Add definition of 'inanga spawning sites:' <u>Inanga Spawning Site – means that part of the bed and banks of a lake, river, artificial watercourse, coastal lagoon or wetland that is between mean high water springs and mean low water neaps and is within the area identified as a 'Inanga Spawning Site' in Schedule 17 and on the Planning Maps.</u>	Support in part	Ngāi Tahu supports the addition of a definition of 'inanga spawning sites' to provide clarity – but only if the concerns raised in the Ngāi Tahu submission are addressed as part of the definition.
Royal New Zealand Forest and Bird Protection	98	2.9 Definitions, Translations and Abbreviations	Retain definition of 'Inanga Spawning Habitat'. AND	Support	Agree that inanga spawning habitats should be protected, however as per Ngāi Tahu submission, further amendments are

Society			Include a definition of Inanga Spawning Sites		required to either the definition or planning maps. Ngāi Tahu supports inclusion of a definition of Inanga Spawning Sites, but only if concerns raised in Ngāi Tahu submission are addressed as part of the definition.
Silver Fern Farms Limited	144	2.9 Definitions, Translations and Abbreviations	Retain the definition of 'Wastewater', but include clarification that the definition does not include industrial/trade processing waste.	Neutral	Ngāi Tahu acknowledge the intent of PC4 to differentiate (through amendments to definitions) industrial and trade wastes from sewage and greywater. However to provide further clarity a definition of industrial and trade waste may be simpler for plan users.
Silver Fern Farms Limited	145	2.9 Definitions, Translations and Abbreviations	Retain the definition of 'Animal Effluent', but include clarification that the definition does not include incidental animal effluent present in livestock processing waste streams.	Oppose in part	Ngāi Tahu supports efforts to ensure definitions in the plan provide clarity to users. Ngāi Tahu seeks to ensure that ambiguity around livestock processing waste is included in the appropriate definition (but not excluded).
ANZCO, CMP Canterbury & Five Star Beef	150	2.9 Definitions, Translations and Abbreviations	Amend the definition of 'Wastewater' as follows: Means sewage, toilet wastes, and grey water (household wastewater from kitchens, bathrooms and laundries), but excludes stormwater, trade wastes and other industrial or trade process wastes <u>(which includes waste from livestock processing)</u> .	Neutral	Ngāi Tahu acknowledge the intent of PC4 to differentiate (through amendments to definitions) industrial and trade wastes from sewage and greywater. However to provide further clarity a definition of industrial and trade waste would be simpler for plan users and could address ambiguity around processing waste.
Transpower New Zealand Limited	157	2.9 Definitions, Translations and Abbreviations	Amend the definition of 'Vegetation Clearance': Means removal of vegetation by physical, mechanical, chemical or other means but excludes: b. clearance for the establishment or maintenance of utilities or structures	Oppose	Ngāi Tahu opposes any exclusion of discharge of sediment or sediment-laden water where it may result in direct discharge to water bodies.

			<u>including any associated discharge of sediment or sediment-laden water.</u>		
Waimakariri District Council	200	2.9 Definitions, Translations and Abbreviations	Provide for protection for the source of water for all Council-operated community drinking-water supplies	Support	Ngāi Tahu supports protection for all sources of drinking water.
Waimakariri District Council	205	2.9 Definitions, Translations and Abbreviations	Amend the definition of 'reticulated stormwater system' as follows: means a network of pipes, swales, kerbs <u>drains</u> and channels owned or operated by a network utility operator that collects stormwater within urban areas <u>as areas zoned residential, commercial or business use in a district plan</u> and conveys that stormwater to any device, wetlands retention or detention pond or infiltration basin for the treatment of stormwater, prior to a discharge to land, groundwater, or surface water.....	Oppose	As per the Ngāi Tahu submission, reticulated stormwater systems exist in non-urban areas and should be included.
Fonterra Co-operative Group Ltd and DairyNZ	240	2.9 Definitions, Translations and Abbreviations	Amend definition of Inanga Spawning Habitat as follows: means that part of the bed and banks of a <u>natural</u> lake, river, artificial watercourse, ...	Oppose	Inanga are known to breed in artificial waterbodies.
Egg Producer Federation NZ and Poultry Industry Association of NZ	270	2.9 Definitions, Translations and Abbreviations	Amend the definition of 'Animal effluent' as follows: means faeces and urine from animals other than humans, including associated process water, wash-down water, contaminants and sludge but excluding solid animal waste. For the purposes of this definition, it does not include <u>poultry washdown</u> water and incidental animal effluent present in livestock processing	Oppose	Excluding poultry washdown water from the definition is inappropriate and inconsistent with the intent of the plan to appropriately manage all types of animal effluent.

			waste streams.		
Mackenzie District Council		2.9 Definitions, Translations and Abbreviations	<p>Delete PC4 amendments to the definition of 'Community drinking-water supply'.</p> <p>OR</p> <p>Amend as follows:</p> <p>means a drinking-water supply that is recorded in the drinking-water register maintained by the Chief Executive of the Ministry of Health (the Director-General) under section 69J of the Health Act 1956 that provides no fewer than 25 people with drinking-water for not less than 60 days each calendar year, <u>or is a drinking water supply operated by a local authority irrespective of the number of people it serves.</u></p> <p>OR</p> <p>means a drinking-water supply that is recorded in the drinking-water register maintained by the Chief Executive of the Ministry of Health (the Director-General) under section 69J of the Health Act 1956 that provides no fewer than 25 people with drinking-water for not less than 60 days each calendar year, <u>or is a drinking water supply specified in schedule X.</u></p>	Support in part	Ngāi Tahu seeks protection for group drinking water supplies that supply more than one household but fewer than 25 people - refer to Ngāi Tahu submission for further detail.
Combined Canterbury Provinces, Federated Farmers of New Zealand	390	2.9 Definitions, Translations and Abbreviations	<p>Amend definition of 'Inanga Spawning Habitat' as follows:</p> <p>means that part of the bed and banks of a <u>natural</u> lake, river, artificial watercourse, ...</p> <p>And</p>	Oppose	<p>Inanga are known to breed in artificial waterbodies.</p> <p>Refer to Ngāi Tahu submission for suggested amendments relating to inanga spawning definitions.</p>

			Amend definition of Inanga Spawning Sites to better reflect that CRC is referring to habitat that is suitable for inanga spawning (in contrast to known spawning sites)		
Oil Companies Z Energy, Mobil and BP	401	2.9 Definitions, Translations and Abbreviations	Retain the definition of 'Community drinking water supply'.	Oppose in part	Group drinking water supplies supplying fewer than 25 people should be protected under the plan – refer to Ngāi Tahu submission for further detail.
Waimakariri District Council	199	4.14B	Delete policy requiring consideration of Ngāi Tahu values including those expressed in iwi management plans when considering applications for discharges which may adversely affect statutory acknowledgement areas, nohoanga sites, and cultural landscapes identified in this plan or any IMP	Oppose	Ngāi Tahu opposes this submission point. The policy (subject to amendments sought in the Ngāi Tahu submission to further strengthen the policy) recognises the importance of protecting the relationship of Māori and their culture and traditions with ancestral lands from inappropriate subdivision, use and development (as required by s6 RMA). It also supports the rights and interests of Ngāi Tahu with respect to the Ngāi Tahu Claims Settlement Act 1998. The submitter is concerned that cultural landscapes are not identified in the pCLWRP, however the policy as drafted allows for IMPs to provide this information, supported by appropriate consultation with manawhenua.
Christchurch City Council	96, 510	4.16A	Delete policy requiring operators of reticulated stormwater systems to implement methods to manage the quantity and quality of all stormwater.	Oppose	Ngāi Tahu supports the intention of PC4 to establish an effective regulatory framework for stormwater management that clarifies the respective responsibilities of the regional council and stormwater network owners, and puts the emphasis on managing diffuse pollution at source.

Waimakariri District Council	211	4.16A	Delete policy requiring operators of reticulated stormwater systems to implement methods to manage the quantity and quality of all stormwater.	Oppose	See above
Oil Companies, Z Energy, Mobil and BP	417	4.16A	Delete policy requiring operators of reticulated stormwater systems to implement methods to manage the quantity and quality of all stormwater.	Oppose	See above
Mackenzie District Council	335	4.23A Drinking water provisions	Delete policy regarding protection of quality of water abstracted from community drinking-water supply sources	Oppose	Protection of community drinking water supply sources is essential. Refer to Ngāi Tahu submission regarding definitions.
Oil Companies Z Energy, Mobil and BP	419	4.23A Drinking water provisions	Delete policy regarding protection of quality of water abstracted from community drinking-water supply sources	Oppose	See above
Mackenzie District Council	336	4.23B Drinking water provisions	Delete matters when considering resource consent applications to take or use water for a community drinking-water	Oppose	See above
Oil Companies Z Energy, Mobil and BP	420	4.23B Drinking water provisions	Delete matters when considering resource consent applications to take or use water for a community drinking-water	Oppose	See above
Royal New Zealand Forest and Bird Protection Society	99	4.31 Livestock exclusion from water bodies	Amend 4.31(b) as follows: (b) and the waterbody bed and banks closely adjacent to <u>and upstream of</u> these areas; and	Support	Submission point is consistent with Ngāi Tahu submission.
Ellesmere Sustainable Agriculture Inc	33	4.31 Livestock exclusion from water bodies	Delete amendments relating to inanga spawning.	Oppose	Inanga and freshwater are both taonga that require protection – refer to Ngāi Tahu submission for suggested additions to further strengthen this policy.
H Rennie	279	4.31 Livestock exclusion from water bodies	Amend as follows: 4.31... (b) excluding stock from freshwater	Oppose	Inanga and freshwater are both taonga that require protection – refer to Ngāi Tahu submission for suggested additions to further

			<p>bathing sites listed in Schedule 6, inanga and salmon spawning sites listed in Schedule 17 , and other sensitive waterbody areas and the waterbody bed and banks closely adjacent to these areas ; and</p> <p>(ba) excluding stock from inanga spawning habitat during the period of 1 January to 1 June inclusive; and AND</p> <p>Delete mention of 'inanga spawning habitat'.</p>		strengthen this policy.
Fish and Game Council North Canterbury	476	4.31 Livestock exclusion from water bodies	<p>Amend as follows:</p> <p>4.31...</p> <p>(b) excluding stock from freshwater bathing sites listed in Schedule 6, inanga and salmon spawning sites listed in Schedule 17 and other sensitive waterbody areas and the waterbody bed and banks closely adjacent to <u>and upstream of</u> these areas;</p>	Support	Amendment proposed by submitter is consistent with Ngāi Tahu submission.
Oil Companies Z Energy, Mobil and BP	421	4.76A Site Dewatering	<p>Amend as follows:</p> <p>Adverse effects on surface water quality <u>and groundwater quality</u> are minimised through limiting <u>as far as practicable</u> the concentration of sediment and other contaminants present in the dewatering water prior to its discharge to surface water <u>or land</u></p>	Oppose	Oppose 'as far as practicable' as in some cases the most practicable option may still result in adverse effects on water quality.
Combined Canterbury Provinces, Federated Farmers of New Zealand	436	4.85A Activities in Beds of Lakes and Rivers	Delete and replace	Oppose	Definition proposed by submitter does not prevent encroachment of activities in the beds and margins, or limit vegetation clearance – both of which are important to protect ecosystem functioning of rivers,

					lakes, wetlands and lagoons.
Ellesmere Sustainable Agriculture Inc	35	4.86A Activities in Beds of Lakes and Rivers	Delete policy that seeks to protect inanga spawning sites from effects of activities in beds and margins of water bodies	Oppose	Inanga are a taonga species and should be protected. Refer to Ngāi Tahu submission for amendments requested.
Royal New Zealand Forest and Bird Protection Society	100	4.86A Activities in Beds of Lakes and Rivers	Amend as follows: Inanga spawning sites are protected through, as a first priority , avoiding activities within the beds and margins of lakes, rivers, hāpua, wetlands, coastal lakes and lagoons that may damage inanga spawning sites. , and where these activities cannot be avoided, the use of best practicable options to minimise all impacts.	Support	Support increased protection of inanga.
H Rennie	609, 645	4.86B Activities in Beds of Lakes and Rivers	Delete mention of 'inanga spawning habitat'.	Oppose	Inanga are a taonga species and should be protected – Ngāi Tahu seeks for this policy to be retained (refer to Ngāi Tahu submission for discussion).
Ellesmere Sustainable Agriculture Inc	36	4.86B Activities in Beds of Lakes and Rivers	Delete	Oppose	Inanga are a taonga species and should be protected – Ngāi Tahu seeks for this policy to be retained (refer to Ngāi Tahu submission for discussion).
Waimakariri District Council	619	Section 5 Region wide Rules	Provide for protection for the source of water for all Council-operated community drinking-water supplies.	Support	Group drinking water supplies supplying fewer than 25 people should be protected under the plan – refer to Ngāi Tahu submission for further detail.
H Rennie	300	5.68A Stock exclusion	Amend as follows: 5.68A ... 1. The bed (including the banks) of a braided river is limited to the wetted channels, any gravel islands, the gravel margins, and (1) the outer inner edge of any flood	Oppose	Ngāi Tahu supports the wording as notified as it provides clarity and appropriate distances.

			protection vegetation owned or controlled by the CRC for flood protection purposes; or <u>(1a) where flood protection vegetation owned or controlled by the CRC is discontinuous, the edge of the river bed shall be determined by projecting a connecting continuation of the line of vegetation as if it were to continue to lie adjacent to the river bed in the manner it had been up to the point of discontinuation; or</u> ...		
Malmar Farms Limited	251	5.68A Stock exclusion	Delete	Oppose	See above
Erralyn Farm Limited	357	5.68A Stock exclusion	Delete.	Oppose	See above
Combined Canterbury Provinces, Federated Farmers of New Zealand	439	5.68A Stock exclusion	Delete, or amend as follows: 5.68A For the purpose of Rules 5.68 to 5.71 of this plan: (1) The bed (including the banks) of a braided river <u>the Waimakariri, Rakaia, Rangitata and Waitaki Rivers</u> is the wetted channels, any gravel islands and the gravel margins, and (i) The outer edge of any flood protection vegetation owned or controlled by the CRC for flood protection purposes, <u>and excludes stopbanks which are located on the landward side of any flood protection vegetation</u> ; or ...	Oppose	Ngāi Tahu supports the wording as notified as it provides clarity and appropriate distances. In addition, restricting 5.68A(1) to only some braided rivers is inappropriate.
Ellesmere	38	5.71 Use &	Delete amendment to 5.71(1).	Oppose	Inanga are a taonga species, and protection

Sustainable Agriculture Inc		disturbance of beds and banks			of their habitat is an essential component of their protection.
Combined Canterbury Provinces, Federated Farmers of New Zealand	443	5.71 Use & disturbance of beds and banks	Delete proposed PC4 amendments to 5.71(1). AND amend Rule 5.68 (3) by adding: <u>(x) farmed cattle, deer or pigs grazing the bed or banks of permanently flowing streams within the areas identified as inanga spawning habitat on the planning maps between 1 January and 1 June inclusive.</u> AND Amend the activity status to discretionary rather than prohibited.	Oppose	See above
H Rennie	610	5.71 Use & disturbance of beds and banks	Delete mention of 'inanga spawning habitat'.	Oppose	Inanga are a taonga species and should be protected – refer to Ngāi Tahu submission for requested amendments.
Fonterra Co-operative Group Ltd and DairyNZ	608	5.71 Use & disturbance of beds and banks	Delete proposed PC4 amendment to Rule 5.71 (1).	Oppose	Ngāi Tahu supports the intention of PC4 to protect inanga spawning sites and habitat, and therefore opposes weakening of this protection. Ngāi Tahu is concerned that not all inanga spawning sites and habitats have been captured in the table and definition.
Christchurch City Council	511	Stormwater – general	Oppose the stormwater policy and rules and retain the stormwater policies and rules in the LWRP.	Oppose in part	Ngāi Tahu supports the intention of PC4 to establish an effective regulatory framework for stormwater management that clarifies the respective responsibilities of the regional council and stormwater network owners, and puts the emphasis on managing diffuse

					<p>pollution at source.</p> <p>The Ngāi Tahu submission opposes direct discharge of stormwater to water as a permitted activity – refer to submission and relief sought.</p>
Christchurch City Council	512, 513	5.93 and 5.94 Reticulated stormwater systems	Oppose the stormwater policy and rules proposed in Variation 4 to the LWRP and retain the stormwater policies and rules in the LWRP.	Oppose	Ngāi Tahu supports the activity status and discretion matters listed, in the interests of managing contaminants and improving water quality of the receiving environment.
Canterbury District Health Board	234	5.94A Construction phase stormwater	Add: <u>6. The discharge does not occur within the stated set back distances of a drinking water supply intake as specified in schedule 1.</u>	Support	Ngāi Tahu supports the protection of drinking water supplies. However Ngāi Tahu does not support the discharge of stormwater directly to water as a permitted activity.
Christchurch City Council	514	5.94A Construction phase stormwater	Oppose the stormwater policy and rules proposed in Variation 4 to the LWRP and retain the stormwater policies and rules in the LWRP.	Oppose in part	Ngāi Tahu supports improved management of construction phase stormwater, however opposes the discharge of stormwater directly to water as a permitted activity.
Christchurch City Council	516	5.94C Construction phase stormwater	Oppose the stormwater policy and rules proposed in Variation 4 to the LWRP and retain the stormwater policies and rules in the LWRP.	Oppose	Ngāi Tahu supports the activity status and discretion matters listed, in the interests of managing contaminants and improving water quality of the receiving environment.
Waimakariri District Council	213	5.95 Construction Phase Stormwater	Amend as follows: The discharge of stormwater <u>directly</u> into a river.....	Oppose	Ngāi Tahu oppose stormwater discharge directly to water.
Oil Companies, Z Energy, Mobil and BP	428	5.95 Construction Phase Stormwater	Retain	Oppose	Ngāi Tahu oppose stormwater discharge directly to water – see submission for requested amendments.
Fonterra Limited	449	5.95 Construction Phase Stormwater	Retain	Oppose	Ngāi Tahu oppose stormwater discharge directly to water – see submission for requested amendments.
Royal New Zealand	269	5.119 Site	Clarify that river includes spring-fed	Support	Ngāi Tahu support this clarification, as all

Forest and Bird Protection Society		Dewatering - Groundwater	streams		<p>freshwater is a taonga.</p> <p>Note that Ngāi Tahu supports limiting the concentration of sediment in the discharge, but seeks that the dewatering water is treated on or through land before being discharged to water.</p>
Horticulture New Zealand	473	5.123	Amend Condition 13. as follows: Where the water is to be used for irrigation, the preparation and implementation of a Farm Environment Plan in accordance with Schedule 7 <u>that demonstrates that the water is being used efficiently to manage the effects arising from the use of the water.</u>	Oppose	Ngāi Tahu supports water use efficiency however water efficiency is not the only consideration to 'manage the effects arising from the use of the water'. Ngāi Tahu opposes narrowing the scope of this matter of discretion.
Ellesmere Sustainable Agriculture Inc	48, 49, 50, 51, 52, 53	5.136, 5.137, 5.138, 5.139, 5.140, 5.141 Structures	Delete amendments relating to inanga spawning.	Oppose	Inanga are a taonga species and should be protected. Ngāi Tahu supports intention of rule but queries consistency in dates throughout the plan. Refer to Ngāi Tahu submission for further detail and requested amendments.
H Rennie	633, 634, 635	5.136, 5.137, 5.138	Delete mention of 'inanga spawning habitat'.	Oppose	See above
Oil Companies Z Energy, Mobil and BP	501	5.139 Structures	Amend as follows: The use and maintenance of structures ... river, <u>and the consequential deposition of substances on, in or under the bed of a river or lake, the excavation or other disturbance of the bed of river or lake, and any associated take, discharge and diversion of water</u> are permitted activities ...	Oppose	Condition (2) clarifies the extent to which deposition of material can occur as a permitted activity. The submitter's proposed amendment is unnecessary and potentially misleading with regards to take, discharge and diversion of water as a permitted activity.

H Rennie	636, 637, 638	5.139, 5.140, 5.141 Structures	Delete mention of 'inanga spawning habitat'.	Oppose	Inanga are a taonga species and should be protected. Refer to Ngāi Tahu submission for further detail and requested amendments.
Fish and Game Council North Canterbury	487	5.140A Structures	Add: <u>5. The associated excavation, disturbance and deposition of substances on or in the bed of a lake or river does not result in the stranding of fish in pools or channels.</u>	Support	Native fish such as inanga and tuna are taonga to Ngāi Tahu.
H Rennie	639	5.148 Gravel from Lake and Riverbeds	Delete mention of 'inanga spawning habitat'.	Oppose	Inanga are a taonga species and should be protected. Refer to Ngāi Tahu submission for further detail and requested amendments.
Ellesmere Sustainable Agriculture Inc	57	5.148 Gravel from Lake and Riverbeds	Delete amendment to condition 9 relating to 'inanga spawning habitat.'	Oppose	See above
H Rennie	640, 641	5.151, 5.152 Gravel from Lake and Riverbeds	Delete mention of 'inanga spawning habitat'.	Oppose	See above
Ellesmere Sustainable Agriculture Inc	58, 59	5.151, 5.152 Gravel from Lake and Riverbeds	Delete amendment to condition 2 relating to 'inanga spawning habitat.'	Oppose	See above
H Rennie	642	5.163 Vegetation in Lake and Riverbeds	Delete mention of 'inanga spawning habitat'.	Oppose	See above
Director General of Conservation	596	5.164 Vegetation in Lake and Riverbeds	Add new condition: <u>No vegetation shall be disturbed, removed, damaged or destroyed without the prior written permission of the person or agency responsible for the management of the river or lakebed.</u>	Support in part	As an agency responsible for the management of some lake beds, Ngāi Tahu supports this condition. However, condition should not restrict Ngāi Tahu access to cultural materials and customary activities.
Director General of Conservation	597	5.166 Vegetation in Lake and Riverbeds	Add new condition: <u>No vegetation shall be disturbed, removed, damaged or destroyed without the prior written permission of the</u>	Support	See above

			<u>person or agency responsible for the management of the river or lakebed.</u>		
H Rennie	643, 644	5.167, 5.168 Earthworks and Vegetation Clearance in Riparian Areas	Delete mention of 'inanga spawning habitat'.	Oppose	Inanga are a taonga species and should be protected. Refer to Ngāi Tahu submission for further detail and requested amendments.
Ellesmere Sustainable Agriculture Inc	61	5.167 Earthworks and Vegetation Clearance in Riparian Areas	Delete condition 4 relating to inanga spawning habitat.	Oppose	See above
Christchurch City Council	94	Schedule 17 Salmon and Inanga Spawning Sites	Amend to ensure that all significant inanga spawning sites within Christchurch and Banks Peninsula are identified correctly and consistently.	Support in part	Ngāi Tahu agree that identification of further inanga spawning sites and habitats is required. Refer to Ngāi Tahu submission for further detail and requested amendments.
Ellesmere Sustainable Agriculture Inc	190	Schedule 17 Salmon and Inanga Spawning Sites	Delete Inanga Spawning Sites until consultation has been undertaken - specifically remove references to sites located on Waikēkewai Stream.	Oppose in part	Ngāi Tahu opposes deletion of inanga spawning sites. With respect to Waikēkewai Stream, the Ngāi Tahu submission notes that in addition to the sites listed in the schedule, there are populations in the stretch from the marae downstream to the lagoon. Refer to the Ngāi Tahu submission for discussion and amendments requested to ensure identification of sites is comprehensive.
Director General of Conservation	601	Schedule 17 Salmon and Inanga Spawning Sites	Add Canterbury mudfish to table 1 and two threatened native fish species to table 2.	Support	Ngāi Tahu supports protection of indigenous biodiversity including native fish.
H Rennie	632	Planning Maps	Delete areas identified as 'inanga spawning habitat'.	Oppose	Inanga are a taonga species and should be protected. Refer to Ngāi Tahu submission for further detail and requested amendments.
Ellesmere Sustainable Agriculture Inc	67	Planning Maps	Delete inanga spawning habitat areas/sites.	Oppose	See above

Ellesmere Sustainable Agriculture Inc	65	Map B066	Delete inanga spawning habitat areas/sites.	Oppose	See above. Refer to Ngāi Tahu submission for further detail and requested amendments.
Ellesmere Sustainable Agriculture Inc	66	Map B076	Delete inanga spawning habitat areas/sites.	Oppose	See above. Refer to Ngāi Tahu submission for further detail and requested amendments.