

**From:** [Angela Christensen CSIFGC](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** ["Scott Pearson"](#)  
**Subject:** Plan Change 4  
**Date:** Tuesday, 1 December 2015 9:13:11 a.m.  
**Attachments:** [PC4 extra further submission LWRP\\_11215.pdf](#)

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Hello

Please find attached a further submission on the additional submissions and points from both North Canterbury and Central South Island Fish & Game Councils.

Best regards

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**RESOURCE MANAGEMENT ACT 1991  
FURTHER SUBMISSION TO ADDITIONAL SUBMISSION POINTS IN THE ADDENDUM TO THE SUMMARY OF DECISIONS  
REQUESTED ON PROPOSED PLAN CHANGE 4 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN**

To: Environment Canterbury

From: North Canterbury Fish & Game and Central South Island Fish & Game

**Address for service:**

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1. This further submission is filed by North Canterbury Fish & Game and Central South Island Fish & Game in response to submissions made in respect of proposed Plan Change 4 to the Canterbury Land and Water Regional Plan. The further submissions are outlined in Annexure 1.
2. Fish & Game 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.

**Annexure 1**

<b>Submitter</b>	<b>Sub ID</b>	<b>Point ID</b>	<b>Reasons</b>	<b>Support/oppose</b>
Selwyn District Council	52245	PC4 LWRP-672	The amendment sought in relation to the discharge of contaminants to surface water could possibly allow for the degradation of the waterbody. The two sub clauses together appropriately address the impacts of point source discharges to water quality. There should not be an "or" option. The NPSFM directs that water quality must be maintained or where degraded, improved. Fish and Game also disagree with insert of the word 'overall' water quality, as reasonable mixing will have already occurred prior to assessment.	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-652	The amendment sought to the policy does not recognise the full intent of the policy which seeks, amongst other things, to preserve habitats of indigenous fauna and the natural character of Canterbury's braided river systems. Indigenous fauna is not solely reliant on indigenous vegetation for habitat, just as preserving the natural character of the braided river systems is not only reliant on indigenous vegetation.	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-653	The submission to delete the policy does not give effect to Part 2 of the Act and does not recognise the Indigenous Biodiversity target within the CWMS.	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-654	It is not appropriate to delete this policy in anticipation that a more comprehensive review is completed. It is known that inanga species are classified as "declining" and that the biggest threat is considered to be the destruction and restriction of spawning habitats. Failure to put in place policies to help protect inanga habitat does not give effect to Part 2 of the Act, does not	Oppose

<b>Submitter</b>	<b>Sub ID</b>	<b>Point ID</b>	<b>Reasons</b>	<b>Support/oppose</b>
			give effect to the NPSFM, does not recognise the objectives and policies of the CRPS, and does not recognise the Indigenous Biodiversity target in the CWMS.	
Fulton Hogan Limited	66287	PC4 LWRP-655	The sought deletion of the policy does not provide for sustainable management of gravel extraction.	Oppose
Selwyn District Council	52245	PC4 LWRP-680	Fish and Game is not supportive of the proposed move to permitted activity status in this submission, given the difficulty in effectively monitoring this permitted activity.	Oppose
Selwyn District Council	52245	PC4 LWRP-683	The amendment sought to the policy defeats the purpose of the policy-habitat restoration. To delete the wording as sought weakens the rule by then leaving it for someone to determine how the benefits are assessed if it's not for the sole purpose of habitat restoration.	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-657	The amendment sought does not give appropriate regard to indigenous fauna and habitat and does not support life supporting capacity or ecosystem health.	Oppose
Fulton Hogan Limited	66287	PC LWRP-659	The amendment sought to delete recognition of inanga spawning habitat does not support life supporting capacity or ecosystem health nor does it give effect to the higher planning instruments (RMA, NPSFM, CRPS).	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-660	This rule has been designed to protect specific habitats and Fish and Game oppose its exclusion.	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-661	The rule seeks to address vegetation in lakes and riverbeds.	Oppose

Submitter	Sub ID	Point ID	Reasons	Support/oppose
			<p>Canterbury's braided river systems are unique. Sub clause 9 provides for the protection of these rivers' vegetation areas and diversity and specifically relates to vegetation control. Any discharged sediment loss should be managed under a separate rule.</p>	
Fulton Hogan Limited	66287	PC4 LWRP-662	<p>The amendment sought to delete recognition of inanga spawning habitat does not support life supporting capacity or ecosystem health nor does it give effect to the higher planning instruments (RMA, NPSFM, CRPS).</p>	Oppose
Fulton Hogan Limited	66287	PC4 LWRP-663	<p>The amendment sought to delete recognition of inanga spawning habitat does not support life supporting capacity or ecosystem health nor does it give effect to the higher planning instruments (RMA, NPSFM, CRPS).</p> <p>The amendment sought does not recognise the benefits of riparian vegetation that may not be indigenous for aquatic species and waterfowl.</p>	Oppose  Oppose