

From: [Herb Familton](#)
To: [Mailroom Mailbox](#)
Cc: [Brett Aldridge](#)
Subject: ECan Plan Change 5 DG Submission - DOC-2732068
Date: Friday, 11 March 2016 5:04:25 p.m.
Attachments: [ECan Plan Change 5 DG Submission - DOC-2732068.pdf](#)

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Conservation leadership for our nature *Takina te hi, Tiakina, te ha o te Ao Turoa*



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11 March 2016

Environment Canterbury
PO BOX 345
CHRISTCHURCH 8140
Attention: Brett Aldridge

Dear Brett,

PLAN CHANGE 5 CANTERBURY LAND AND WATER REGIONAL PLAN

Please find enclosed the submission by the Director-General of Conservation in respect of Plan Change 5. The submission identifies the Director-General's concerns.

Please contact Herb Familton in the first instance if you wish to discuss any of the matters raised in this submission at 03 371 3751 or hfamilton@doc.govt.nz.

Yours sincerely



Herb Familton
Resource Management Planner
For: Director-General

Enc. DG Submission

RESOURCE MANAGEMENT ACT 1991

ENVIRONMENT CANTERBURY LAND AND WATER REGIONAL PLAN

TO: ENVIRONMENT CANTERBURY

SUBMISSION ON: **PLAN CHANGE 5**

NAME: Lou Sanson
Director-General of Conservation

ADDRESS: RMA Shared Services
Department of Conservation
Private Bag 4715
Christchurch Mail Centre 8140
Attn: Herb Familton

**STATEMENT OF SUBMISSION BY THE DIRECTOR-GENERAL OF THE
DEPARTMENT OF CONSERVATION**

Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991 (RMA), I, Neil Bolton, Acting Operations Manager, Twizel District, acting upon a delegation from the Director-General of the Department of Conservation, make the following submission in respect of the Proposed Plan Change 5 to the Regional land and Water Plan.

1. This is a submission on the Plan Change 5 to the Regional Land and Water Plan.
2. The Director-General confirms that this submission does not relate to trade competition or the effects of trade competition.
3. The specific provisions of the Proposed Plan that my submission relates to are set out in Attachments 1 to this submission. The decisions sought in this submission are required to ensure that the Land and Water Regional Plan:
 - a. Gives effect to the New Zealand Coastal Policy Statement and the Freshwater Management National Policy Statement (NPSFM) (2014), particularly Objectives A1, A2, B1, and B4 and Policies A4 and B7 of the National Policy Statement (Freshwater) 2014;
 - b. Manages freshwater ecosystems and species to be consistent with Part 2 of the Resource Management Act, particularly section 5(2) (b) and (c), and
 - c. Recognises and provides for the matters of national importance listed in section 6 (c) of the Act and to has particular regard to the other matters in section 7 of the Act;
 - d. Promotes the sustainable management of natural and physical resources;
 - e. Has particular regard to the Canterbury Water Management Strategy Vision and Principles 2, 3, 4, 5, 6, 8 and 9, and

- f. Gives effect to the Ahuriri Water Conservation Order, and
 - g. Is consistent with the Canterbury Regional Policy Statement (RPS) including Objectives 7.2.1, 7.2.2, 7.2.3, 9.2.1, 9.2.2, 9.2.3 and Policies 7.3.1, 7.3.3, 7.3.4, 7.3.6, 7.3.7, 7.3.9, 7.3.11, 9.3.1, 9.3.2, 9.3.3, 9.3.4, 9.3.5, 9.3.6, 10.3.1, 10.3.2, and
 - h. Is consistent with Regional Land and Water Plan Objective and Policies: Objectives 3.7, 3.8, 3.14, 3.17, 3.18, 3.24 and Policies 4.3, 4.5, 4.7, 4.8A and B, 4.13, 4.14, 4.31, 4.32, 4.34, 4.35, 4.36, 4.37, 4.38, 4.40, 4.41, 4.47, 4.81, 4.82, 4.83, 4.84, 4.85.
 - i. Has regard to the Canterbury Conservation Management Strategy and the *Aoraki / Mt Cook National Park Management Plan*, and
 - j. The changes sought are necessary, appropriate, and sound resource management practice.
4. In general provisions supported as identified in Attachment 1 by the Director-General include:
- a. The codification of good management practise with regards to water quality
 - b. The setting of cumulative limits for contaminants generally
 - c. Ensuring the Waitaki Nitrogen load limits are accounted for and not exceeded
 - d. The setting of in-stream limits to particular water bodies
 - e. The red zoning (no increase in nutrient load) of the Ahuriri and Hakataramea zones; and
 - f. The general zoning approach adopted in Figure One of the Plan Change.
5. The provisions not supported, or which require refinement as identified in Attachment 1 include:
- a. Several areas require strengthening to fully reflect and have particular regard to the CWMS Vision and Principles;
 - b. The addition of a more in-depth discussion on the Mackenzie Agreement would strengthen the local flavour of the plan change
 - c. The provisions for terrestrial habitat / indigenous biodiversity require amendment;
 - d. The lack of provisions for sustaining the life supporting capacity of threatened native fish, specifically the lowland Long jawed Galaxias and the Bignose Galaxias, who are present in the Waitaki catchment;
 - e. The lack of provisions to address the adverse effects of cumulative nutrient enrichment on freshwater species, habitats, and ecosystems generally.
 - f. The lack of emphasis of the significance of the recreational and tourism value of the rivers and lakes in the Waitaki catchment and their reliance on a high water quality for a quality visitor experience.

6.

I **seek** the following decision from the Council:

- 4.1 That the particular provisions of Proposed Plan Change 5 that I support, as identified in this submission including Attachment 1, are retained.
 - 4.2 That the amendments, (including additions and deletions) to Proposed Plan Change 5 sought in Attachments 1 are made.
 - 4.3 Further or alternative relief to like effect to that sought in 4.1 – 4.2 above.
5. I wish to be heard in support of my submission and if others make a similar submission, I will consider presenting a joint case with them at the hearing.



Neil Bolton
Acting Operations Manager
Twizel District

Pursuant to delegated authority¹
On behalf of
Lou Sanson
Director-General of Conservation

Date: 11 March 2016

¹ Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House *Whare Kaupapa Atawhai*, 18/32 Manners Street, Wellington 6011.

ATTACHMENT 1:

PROPOSED PLAN CHANGE 5 – LAND AND WATER PLAN SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

The specific provisions that my submission relates to are set out in Attachment 1. My submissions are set out immediately following these headings, together with the reason and the decision I seek from the Council.

The decision that has been requested may suggest new or revised wording for identified sections of the proposed plan. This wording is intended to be helpful but alternative wording of like effect may be equally acceptable. Text quoted from Proposed Plan Change 5] is shown in *Italics*.

The wording of decisions sought shows new text as underlined and original text to be deleted as ~~striketrough~~.

Unless specified in each submission point my reasons for supporting are that the policies are consistent with the purposes and principles of the Resource Management Act 1991 (RMA).

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
Section 15B Waitaki Sub-Region			
Page 4-1	Resource Description	Aoraki/ Mt Cook is not on the main divide, it is a separate ridge off the main divide	Add <i>“the main divide, near”</i> Before Aoraki/Mt Cook in line 1 paragraph 1
Page 4-1	Resource Description	The new role of the Mackenzie Country Trust should be mentioned, as this is a distinct feature of the governance structures in the region.	One of the objectives of the MacKenzie Country Trust is “to develop strategic and collaborative approach to the management of the Mackenzie Country that balances agricultural land use with conservation, environmental protection, public use, outdoor recreation and landscape protection across all tenures” Or to like effect
Page 4-1	Resource Description	Add a description of the smaller lakes in the Upper Waitaki	Add <i>“major”</i> Before “glacial” in line 7 of paragraph two

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
			<p>Also add in a new sentence before the last sentence .</p> <p><u><i>This include smaller lakes such as Middleton, Alexandra, MaGregor, and Middleton. The shallow lakes are particularly susceptible to nutrient enrichment from agricultural intensification.</i></u></p> <p><u><i>The Waitaki Hydro-Electric Power scheme created a number of lakes in the basin such as Lake Ruataniwha, Lake Poaka and Lake Wardell. Lake Ruataniwha is particularly popular for recreation including rowing and recreational boating.</i></u></p>
Page 4-4	Resource Description	It is incorrect to say that the level of Lake Ohau has been raised, it is however, artificially controlled.	<p>Delete “Ohau” from paragraph 2 line 2.</p> <p>Add a new sentence as follows:</p> <p><u><i>“The level of Lake Ohau is artificially controlled but it has not been raised.”</i></u></p>
4-2	Figure 1	The Haldon and Ahuriri sub catchments should be shown on Figure 1	Amend Figure 1 map to show the Haldon and Ahuriri sub catchments
4-2	Resource Description	The natural and recreational values sustained by the waters of the Waitaki need further elaboration, as they are a significant component of the values desired by New Zealanders and overseas tourists.	<p>Add the following:</p> <p><u><i>The Waitaki Catchment contains many very rare species. Examples are the black stilt (world’s rarest wading bird), black-billed gull, Canterbury Knobbled Weevil (all ranked as Nationally Critical) and the Robust Grasshopper (Nationally Endangered). The Lowland and Upland longjawed Galaxias and Bignose Galaxias are threatened and the Alpine Galaxias are at risk, naturally uncommon threatened status</i></u></p> <p><u><i>The black stilt only breeds in the upper Waitaki Catchment, and as far as known, the Waitaki catchment is the only place in the world where the Canterbury Knobbled Weevil and Robust Grasshopper are found.</i></u></p> <p><u><i>Likewise, there are a number of indigenous plant species</i></u></p>

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
			<p><u>associated with lake edges and glacial kettle-holes that are endemic to the Mackenzie basin (Nicholas Head, pers. comm.). The Mackenzie Basin in fact, has a high rate of endemism (species evolved there and only found in that location: e.g. White 2002; Warren Chinn pers. comm.).</u></p> <p><u>The nationally and internationally significant recreational values of the Waitaki River catchment are well documented, particularly for activities such as angling, boating, swimming, and camping.</u></p> <p><u>DOC recognises the recreational values in the Waitaki catchment in documents such as 'Proposed Canterbury Conservation Management Strategy (In prep.)'. This contains a number of policies and statutory outcomes relating to protecting and creating recreational opportunities in the Waitaki catchment, especially with respect to recreational fishing, camping, access and 'Iconic' and 'Gateway' destinations. All of these involve the catchment's waterways.</u></p> <p><u>The Aoraki/Mt Cook National Park Management Plan (DOC 2004) makes reference to the recreational values of rivers in the national park, especially for sight-seeing and tramping.</u></p> <p><u>The 'Recreation Strategy for the Canterbury Conservancy' (DOC 1994) recognised the need for protecting recreational values and access in the high country lakes, and wilderness values of the Godley River, which were both under threat from development.</u></p>
4-6	Other Regional Plans that apply	Section 66 (2) (c) (i) requires ECan to have regard to other management plans and strategies prepared under other Acts.	<p>Add a new:</p> <p><u>15B.3A Management Plans that Apply to the Waitaki Sub Region</u></p>

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
		The Department administers a large proportion of the catchment and downstream water users are reliant on the naturally high quality water provided by the ecosystem services from the land managed by the Department.	<ul style="list-style-type: none"> • <u>Canterbury Conservation Management Strategy</u> • <u>Aoraki/ Mount Cook National Park Management Plan</u>
4-5	Definitions	These are required to give effect to the plan policies and rules.	Retain all definitions
4-6	Policies 15B.4.1-19, 21, 22, 26 and 28	These policies are appropriate and give effect to the NPSFM, the vision and principles of the CWMS, the Canterbury RPS and the Canterbury Land and Water Regional Plan.	Retain
4-9	Policy 15B.4.18	New irrigation scheme in the Waitaki should seek to protect and enhance existing freshwater values.	<p>Amend Policy as follows:</p> <p><i>Within the Waitaki subregion, water <u>and freshwater habitat quality</u> is maintained by requiring:</i></p> <p>Add after a) a new</p> <p>b)</p> <ul style="list-style-type: none"> i. <u>Provision of riparian buffer strips on waterways</u> ii. <u>Native planting where appropriate</u> iii. <u>Fencing of springheads and spring-fed waterways</u> iv. <u>Use of artificial wetlands where appropriate; and</u> <p>And</p> <p>Consequential renumbering of (b) to (c)</p>

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
4-10	Policy 15B.4.20	<p>Native Fish</p> <p>The Waitaki is biogeographically important for a range of native fish, including the Lowland and Upland Longjaw Galaxias and Bignose galaxias (all threatened) and the Alpine Galaxias (at risk, naturally uncommon)</p> <p>Adaptive Management</p> <p>The plan change does not proposed an enforceable adaptive management framework the is consistent with recent consents such as the adjacent <i>Five Rivers</i> (ENV-2011-CHC-136) case.</p>	<p>Amend as follows:</p> <p><i>Water and fish, bird and freshwater Habitat quality in the Upper Waitaki Freshwater management unit is maintained by:</i></p> <p>Delete existing section d)</p> <p><u><i>d) Avoiding increases in nitrogen losses from farming activities adjacent to and upstream of threatened native fish habitat, in particular, springs and spring fed rivers.</i></u></p> <p><u><i>(e) specifically applying to all resource consents granted for the use of land for a farming activity, aquaculture operation, or waste water activity, adaptive management conditions providing for</i></u></p> <ol style="list-style-type: none"> <u><i>1. Water quality triggers</i></u> <u><i>2. Receiving environment monitoring</i></u> <u><i>3. Nutrient discharge allowances</i></u> <u><i>4. Graduated nutrient reductions</i></u> <p><u><i>at a property, scheme or catchment level to meet the water quality outcomes in the relevant table 15B water quality limits or outcomes..</i></u></p>
4-10	Policy 15B.4. 19 and Upper Waitaki Freshwater and Habitat Quality	<p>These policies are require amendment to give effect to section 5 (b) and (c) of the Act and section 6 (c) and to give effect to the NPSFM, the vision and principles of the CWMS, the Canterbury RPS and the Canterbury Land and Water Regional Plan.</p>	<p>Amend as follows:</p> <p><i>Water and Habitat quality in the Upper Waitaki Freshwater management unit is maintained by:</i></p> <p><u><i>(a) After 13 February 2016, avoiding adverse effects on threatened native fish habitats.</i></u></p> <p><u><i>Consequential renumbering of (a) and (b) to (b) and (c)</i></u></p>

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
4-11	Policy 15B.4.24 Hakataramea Freshwater and Habitat Quality	These policies are require amendment to give effect to section 5 (b) and (c) of the Act and section 6 (c) and to give effect to the NPSFM, the vision and principles of the CWMS, the Canterbury RPS and the Canterbury Land and Water Regional Plan.	<p><i>Amend as follows:</i></p> <p><i>Water <u>and Habitat</u> quality in the Hakataramea Freshwater management unit is maintained by:</i></p> <p><i>(a) <u>After 13 February 2016, avoiding adverse effects on threatened native fish habitats.</u></i></p> <p><i><u>Consequential renumbering of (a) and (b) (c) to (b) and (c) and (d)</u></i></p>
4-11	Policy 15B.4.25 Valley and Mid Tributaries Freshwater and Habitat Quality	These policies are require amendment to give effect to section 5 (b) and (c) of the Act and section 6 (c) and to give effect to the NPSFM, the vision and principles of the CWMS, the Canterbury RPS and the Canterbury Land and Water Regional Plan.	<p><i>Amend as follows:</i></p> <p><i>Water <u>and Habitat</u> quality in the Valley and Mid Tributaries Freshwater management unit is maintained by:</i></p> <p><i>(a) <u>After 13 February 2016, avoiding adverse effects on threatened native fish habitats.</u></i></p> <p><i><u>Consequential renumbering of (a) and (b) (c) to (b) and (c) and (d)</u></i></p>
	Policy 15B.4.26 Northern Fan Freshwater and Habitat Quality	These policies are require amendment to give effect to section 5 (b) and (c) of the Act and section 6 (c) and to give effect to the NPSFM, the vision and principles of the CWMS, the Canterbury RPS and the Canterbury Land and Water Regional Plan.	<p><i>Amend as follows:</i></p> <p><i>Water <u>and Habitat</u> quality in the Northern Fan an Freshwater management unit is maintained by:</i></p> <p><i>(a) <u>After 13 February 2016, avoiding adverse effects on threatened native fish habitats.</u></i></p> <p><i><u>Consequential renumbering of (a) and (b) (c) to (b) and (c) and (d)</u></i></p>
4-11	Policy on Indigenous Biodiversity 15B.4.23	This provision on terrestrial I biodiversity is supported but the policy only applies to the Haldon and Mid	<p>Replace first line with</p> <p>Policy 15B.4.23 is supported with amendment as follows:</p>

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
		<p>Catchment zone. The policy omits the need to protect significant freshwater biodiversity and significant habitats of indigenous fauna. Freshwater management however is a role of the Regional Council and the Canterbury Land and Water Plan does not comprehensively address section 6 (c) matters with regard to freshwater. Such a provision will ensure consistency with the NPS (Freshwater) the Vision and Principles of the CWMS, the Canterbury RPS, the Canterbury Land and Water Plan, and the Canterbury Conservation Management Strategy.</p>	<p><i>Significant indigenous terrestrial biodiversity and habitat is maintained in the four freshwater management units Haldon and Mid Catchment by:</i></p> <p>Retain (a) and (b)</p> <p>Add a new Policy 15B.4.23A:</p> <p><i>Significant indigenous freshwater biodiversity and habitat is maintained in the four freshwater management units by:</i></p> <p>(a) <i>The implementation of a regional plan change to the Canterbury Land and Water Regional Plan notified after 13 February 2016 that require the identification and protection of significant freshwater biodiversity and habitat .</i></p>
4-12 – 4- 35	All use of land for a farming activity controlled activity rules	<p>The proposed rules do not protect significant freshwater biodiversity and significant habitats of indigenous fauna from adverse effects.</p> <p>Policy 15B.4.23 provides that this be undertaken by the Regional Council until District Council plan changes are notified for terrestrial values.</p> <p>Freshwater management however, is a role of the Regional Council. Such a provision will ensure</p>	<p>Make all those rules restricted discretionary activities with matters 1 and 2 below as additional matters of control</p> <ol style="list-style-type: none"> <u>Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and</u> <u>Methods to protect significant indigenous freshwater biodiversity and habitat</u>

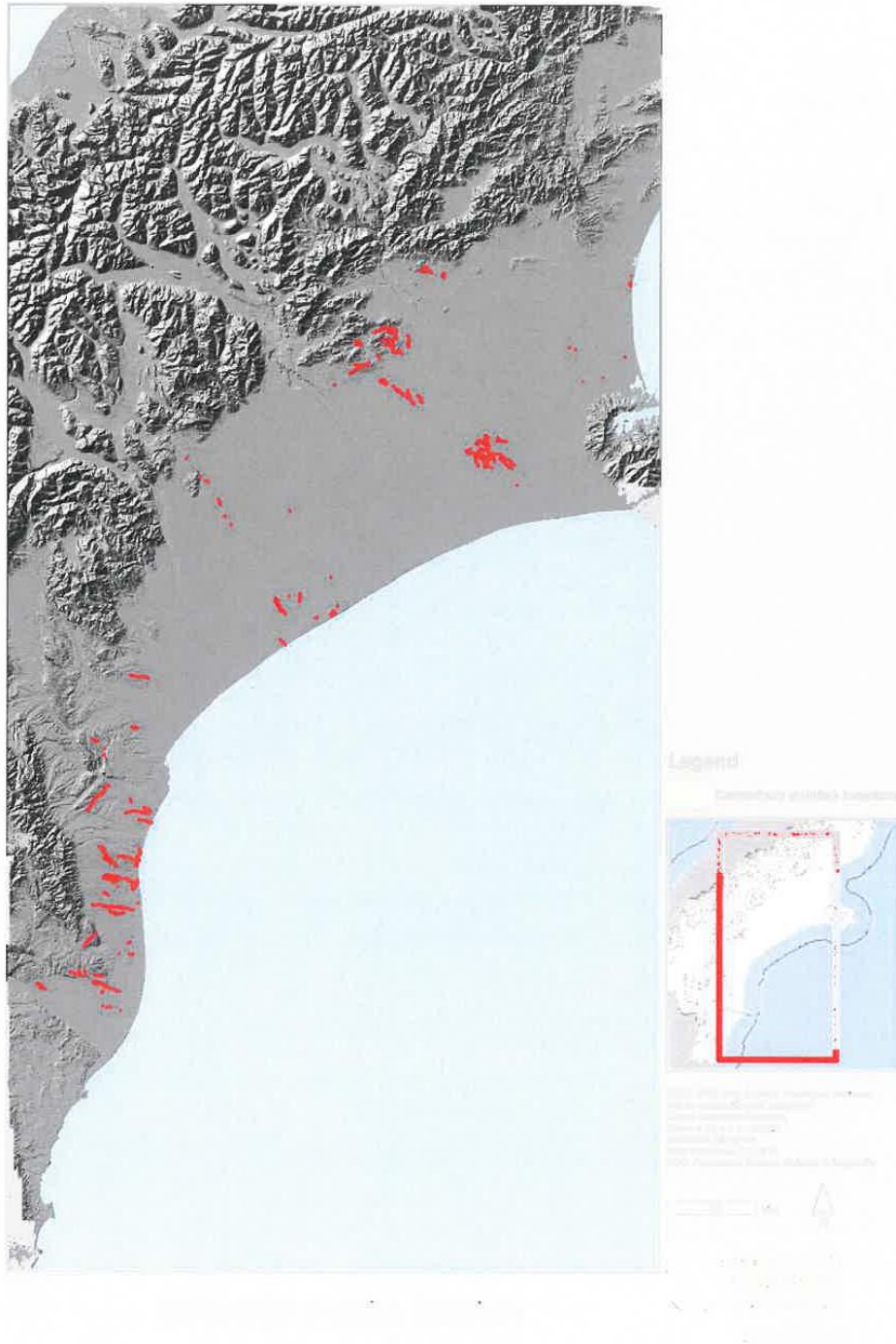
PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
		consistency with the NPS (Freshwater) , the Vision and Principles of the CWMS, the Canterbury RPS, the Canterbury Land and Water Plan, and the Canterbury Conservation Management Strategy.	
4-12 – 4-35	All use of land for a farming activity restricted discretionary activity rules	<p>The proposed rules do not protect significant freshwater biodiversity and significant habitats of indigenous fauna. Policy 15B.4.23 provides that this be undertaken by the Regional Council until District Council plan changes are notified for terrestrial values.</p> <p>Freshwater management however, is a role of the Regional Council. Such a provision will ensure consistency with the NPS (Freshwater) , the Vision and Principles of the CWMS, the Canterbury RPS, the Canterbury Land and Water Plan, and the Canterbury Conservation Management Strategy.</p>	<p>Either add the following matters of control to all use of land for a farming activity restricted discretionary rules</p> <p>3. <u>Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and</u></p> <p>4. <u>Methods to protect significant indigenous freshwater biodiversity and habitat</u></p> <p><u>Or</u></p> <p>Make those rules fully discretionary activities.</p>
4-39	Tables 15B (c), 15 (f), 15 B (h) 15 B (i) and unintelligible table "Flow Sensitive Catchments" on page 4-44	The water quality limits are required to give effect to Part II of the Act, NPSFM (2014) Objectives and Policies A1, A2, B1, and B4 and Policies A4 and B7, the Vision and Principles of the CWMS, the Objectives and Policies of the Canterbury RPS and Canterbury Land and Water Regional Plan.	Retain
4.41	Tables 15B (b) and 15B(d)	<p>Water Quality Lake limits</p> <p>Water Quality limits need to be specified for Kellands</p>	<p>Amend table 15B(b) to provide for:</p> <p>an outcome TLI for Kellands Pond and Wairepo Arm</p>

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
		<p>Pond and Wairepo Arm as they are in a Lake Zone.</p> <p>The water quality limits are required to give effect to Part II of the Act, NPSFM (2014) Objectives and Policies A1, A2, B1, and B4 and Policies A4 and B7, the Vision and Principles of the CWMS, the Objectives and Policies of the Canterbury RPS and Canterbury Land and Water Regional Plan Policy 4.37.</p> <p>Lake Ruataniwha has important recreational value and is a significant rowing venue for the South Island. Water quality limits are also therefore required for this Lake.</p>	<p>of <u><3.3</u>, and an outcome TLI of <u>1.7</u> for Lake Ruataniwha</p> <p>Amend Table 15B(d) as follows:</p> <ul style="list-style-type: none"> • Lake McGregor delete TP of 20 and replace with <u>10</u> • Lake Middleton delete TLI of 3.6 and replace with <u><3.3</u> • Kellands Pond delete TLI of <3.5 and replace with: <ul style="list-style-type: none"> • <u><3.3 TLI</u> • <u>TP<20</u> • <u>TN<350</u> • <u>Chl-a <2 (annual median), <10 (annual maximum)</u> <p>Lake Alexandrina delete TN of 350 and replace with <u>~ 250</u></p> <p>Insert the follow water quality Limits for Lake Ruataniwha:</p> <ul style="list-style-type: none"> • <u>TLI 1.7</u> • <u>TP<10</u> • <u>TN<160</u> • <u>Chl-a <2 (annual median), and <10 (annual maximum)</u> <p>Otherwise support all other values shown</p>
5-4	Schedule 27	There are a number of consents granted that may not be included in the headroom in the Haldon and mid	Amend schedule 27 to ensure nitrogen load limits are not exceeded and account for consents lodged or potentially lodged or granted with ECan, including any

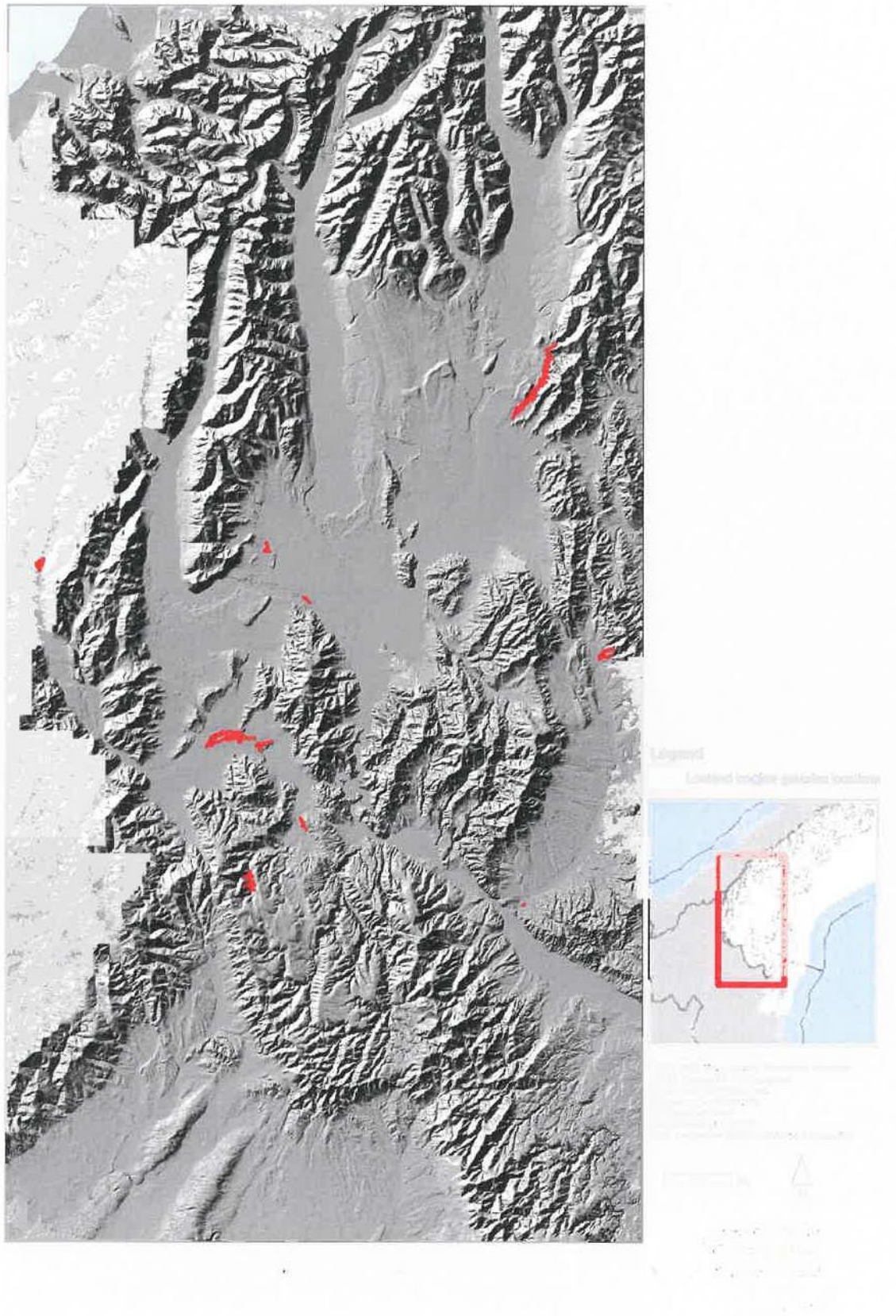
PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
		<p>Catchment zones, plus additional consents that may be granted to come that are not within the Upper Waitaki Nitrogen Headroom per property.</p> <p>These amendments are required to ensure that the Nitrogen losses and loads are capped to meet the overall Table 15.7.4 Nitrogen Load limits</p>	<p>permitted activity rules with additional Nitrogen losses.</p> <p>[consequential amendments will be required to ensure that the Table 15B(f) nitrogen load limits are not exceeded in</p> <p>Definitions: Upper Waitaki Nitrogen Headroom</p> <p>Policies : 15B.4.16, 18, 20,21, and 22 and</p> <p>Rules : 15B.5.8,9,10,20, and 21]</p>
5-1	Schedule 7	<p>Instream Biodiversity values need to be sustained to give effect to Part 2 of the Act, NPSFM Objectives and Policies A1, A2, B1, and B4 and Policies A4 and B7, the Vision and Principles of the CWMS, the Objectives and Policies of the Canterbury RPS and Canterbury Land and Water Regional Plan and to give effect to the Canterbury CMS.</p>	<p>Support the Objective and Targets for Management Area: Mahinga Kai and In-stream Biodiversity values</p> <p>Amend Management Area: Instream Biodiversity values as follows:</p> <p>Target 1 <i><u>" and avoid adverse effects on threatened fish species"</u></i></p> <p>Add a three new targets</p> <ol style="list-style-type: none"> 2. <i><u>"Enable access to enable management agencies to monitor populations of threatened native fish to ensure the sustainability of their population and range"</u></i> 3. <i><u>"Fence out spring heads and spring-fed streams to sustain threatened fish populations and fish habitat."</u></i> 4. <i><u>"Fence out waterways from all stock and provide a riparian buffer to mitigate the effects of P, N, e.coli, and suspended sediment."</u></i>
5-7 – 6-42	Maps	Maps are required to give effect to Part II of the Act,	Retain

PC REF	PLAN PROVISION	POSITION AND REASON	RELIEF SOUGHT
		NPSFM (2014) Objectives and Policies A1, A2, B1, and B4 and Policies A4 and B7, the Vision and Principles of the CWMS, the Objectives and Policies of the Canterbury RPS and Canterbury Land and Water Regional Plan.	

Appendix 1 Distribution of Canterbury Mudfish



Appendix 2 Distribution of Lowland Long Jawed Galaxias



Appendix 3 Distribution of Bignose Galaxias

