

From: [Angela Christensen CSIFGC](#)
To: [Mailroom Mailbox](#)
Subject: Further Submission to PC5 Waitaki sub-region
Date: Friday, 13 May 2016 1:16:53 p.m.
Attachments: [image001.jpg](#)
[CSIFGC further submission PC5 Waitaki sub-region .pdf](#)

Hello

Please find attached a further submission to PC5 Waitaki sub-region (Part B) from Central South Island Fish & Game.

Best regards

Angela Christensen | Resource Officer

Central South Island Fish & Game Council

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To: Environment Canterbury
P O Box 345
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Submitters Name: Central South Island Fish & Game
PO Box 150
Temuka 7948

Attn: Angela Christensen
Email: achristensen@csifgc.org.nz

1. This further submission is filed by Central South Island Fish & Game in response to submissions made in respect of Plan Change 5 (Waitaki sub-region) to the Canterbury Land and Water Regional Plan. The further submissions are outlined in Annexure 1.
2. Central South Island Fish & Game represents a relevant aspect of the public interest and has an interest in the proposal greater than the interest of the general public.
3. Central South Island Fish & Game wishes to be heard in support of its submission and if others make a similar submission would consider presenting a joint case with them at the hearing.

A handwritten signature in black ink that reads 'Angela Christensen'.

Angela Christensen
Resource Officer
Central South Island Fish & Game

Dated 13 May 2016

Statutory managers of freshwater sports fish, game birds and their habitats

Central South Island Region

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ANNEXURE 1

Submitter	Sub ID	Parts of the submission supported or opposed	Reasons	Support / Oppose
<p>Director General of Conservation</p> <p>RMA Shared Services Private Bag 4715 Christchurch 8140</p>	67193	<p>PC5LWRP-1491 Page 4-1 Resource Description</p> <p>PC5LWRP-1678 Schedule 27</p>	<p>The proposed amendment to the Waitaki Sub-region to insert “...<u>at the main divide, near...</u>” more accurately reflects the geographical representation of the region.</p> <p>The proposed amendment to the Haldon sub-catchment stated as “The Haldon sub-catchment includes the <u>major</u> glacial lakes....<u>This includes smaller lakes such as Middleton, Alexandra, MacGregor, and Middleton. The shallow lakes are particularly susceptible to nutrient enrichment from agricultural intensification</u>” better encompasses and describes the waterbodies of the region.</p> <p>The submission seeks to ensure that the nitrogen load limits are not exceeded and account for all consents either granted, lodged or outstanding. This is crucial for determining appropriate and accurate water quality limits and for freshwater outcomes to be met.</p>	<p>Support</p> <p>Support</p> <p>Support</p>
<p>Forest and Bird NZ</p> <p>PO Box 2516 Christchurch 8140</p>	52265	<p>PC5LWRP-1878 15B.2 Other Regional Plans and Instruments that apply to the Waitaki Sub-</p>	<p>15B.2.1 proposes to include guidance on how the two plans (PC5 and WCWARP) work together. This amendment provides clarity on how the region’s water is managed under two separate plans.</p>	<p>Support</p>

		region PC5LWRP-1969 Table 15B(f)	Ensuring that the load limits specified in 15B(f) meet water quality limits is an important link in the plan to ensure freshwater outcomes will be met.	Support
Nga Rūnanga and Te Rūnanga O Ngāi Tahu Attn: Treen Davidson PO Box 13046 Otautahi Christchurch 8021	67166	PC5LWRP-871 15B.4.1	The proposed amendment more accurately describes the connection between land use and water quality to support kaitiakitanga and gives effect to Part II of the RMA (1991).	Support
Federated Farmers of New Zealand & Others PO Box 414 Ashburton 7740	67199	PC5LWRP-2327 15B.4.10(b) PC5LWRP-2555 15B.4.24	It is sought in the submission that sub clause (b) is deleted. The sub clause as it stands provides some level of surety that permitted activities are operating to a Management Plan and good practices. Fish & Game considers that all farms should manage to a plan and that the management of all farms, whether classified as a permitted activity or not, are important factors in determining freshwater outcomes. Proposed amendments (a) and (b) do not appropriately restrict nitrogen losses from farming activities in some of the most sensitive areas. The Hakataramea is a spawning site for both salmon and trout and is at “a high risk of outcomes not being met as a result of an increase in nutrient loss” (s32 report). It was set out in the ZIPA through a collaborative	Oppose Oppose

			community process that water quality and recreational swimming as well as the significant recreational fishery be maintained (inter alia). The amendments will not provide for the water quality outcomes associated with the values of the community and stakeholders, and recommended by the Zone Committee, to be met.	
Meridian Energy Limited PO Box 2146 Christchurch 8140	53960	PC5LWRP-61 15B.4.18	The proposed addition makes the policy more clear in that nitrogen load limits in Table 15B(f) cannot be exceeded for all properties in the Waitaki Sub-region whether the discharge permit is held by an irrigation scheme or principal water supplier or is managed individually.	Support
		PC5LWRP-64 15B.4.21	The proposed amendment to insert new sub clause (a) gives a clearer direction that the loads specified in Table 15B(f) are not to be exceeded and the amendment to sub clause (b) ensures that properties within the Ahuriri Zone manage to the lesser of their Baseline GMP Loss Rate or the combined Nitrogen Baseline, if indeed the N Baseline could be of a lower value. This better protects the water quality in the Ahuriri and meets the community's and Zone Committee's aspirations to maintain water quality in that area.	Support
		PC5LWRP-68 15B.5.8	The amendment provides better clarity to ensure that the total nitrogen headroom is not exceeded in accordance with Schedule 27.	Support
		PC5LWRP-71	The amendment to sub clause (4) provides a stronger approach to	Support

		15B.5.10 (4) PC5LWRP-58 Schedule 27	managing water quality in the Ahuriri Arm to meet the freshwater outcomes. The submission seeks surety that the Upper Waitaki Nitrogen Headroom available per property has taken into account nitrogen losses associated with existing and outstanding consents. This is crucial for determining appropriate and accurate water quality limits and for freshwater outcomes to be met.	Support
Genesis Energy Limited PO Box 9056 Christchurch 8149	67192	PC5LWRP-1759 15B.4.22 (b)	At sub clause (b) the addition to the phrase “whichever is the lesser; and...” better ensures that nitrogen losses are restricted to the lesser amount to protect water quality in the Ahuriri Arm and meet the freshwater objectives in Table 15B(b).	Support
Fertiliser Association of New Zealand	51972	PC5LWRP-1645 15B.5.13B PC5LWRP-1655 15B.5.17 PC5LWRP-1656 15B.5.18	The amendment seeks to change the status of the rule from non-complying to restricted discretionary. This would challenge the integrity of the plan, and water quality limits and outcomes could be compromised. The amendment seeks to change the status of the rule from non-complying to discretionary. The Ahuriri and Upper Waitaki Hill Zones are considered at risk areas and must be managed accordingly. The amendment seeks to change the rule status from prohibited to discretionary. The Ahuriri and Upper Waitaki Hill Zones are considered	Oppose Oppose Oppose

			at risk areas and must be managed accordingly.	
Mackenzie Irrigation Company Ltd PO Box 5546 Dunedin 9058	67161	PC5LWRP-1445 15B.5.14	The proposed amendment would allow percentages of total farm area to replace a defined land area. Fish & Game considers that this may frustrate the framework and limits in the plan set to meet water quality outcomes.	Oppose