

From: [Natasha Sitarz](#)
To: [Mailroom Mailbox](#)
Subject: Further submission on LWRP PC5
Date: Friday, 13 May 2016 4:12:59 p.m.
Attachments: [Forest & Bird further submission Canterbury LWRP PC5.pdf](#)

Please find Forest and Birds further submission on LWRP PC5 attached

Natasha Sitarz
Resource Management Planner
Royal Forest and Bird Protection Society of New Zealand
PO Box 2516, Christchurch
M 021 0242 1854



YOU CAN JOIN US AT www.forestandbird.org.nz



RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 5 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: Natasha Sitarz

Email: n.sitarz@forestandbird.org.nz Phone: 03 940 5520

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. Forest & Bird has for many years expressed a strong interest in the Waitaki catchment, particularly the Upper Waitaki. This has including advocating for greater protection of indigenous species, on land and in freshwater and in protecting and enhancing the health function and integrity of indigenous ecosystems.

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
Director General of Conservation 67193	PC5LWRP-1491 Amend Section 15B introduction	Support	Provides a useful context for users of the plan
	PC5LWRP-1496 Amend Figure 1 [Waitaki Sub-region Freshwater Management Units map]	Support	The Haldon and Ahuriri sub catchments should be included for the reasons explained in the original submission.
	PC5LWRP-1524 15B.2	Support	Provides certainty to identify what the other plans/instruments in this section
	PC5LWRP-2658 15B.4 Policies – New policy	Support	Including a policy to require the identification and protection of significant freshwater biodiversity and habitat is consistent with part 2 of the RMA and the Freshwater NPS
	PC5LWRP-1568 15B.4.18	Support	The proposed amendments provide more clarity for plan uses on what is expected to achieve water quality and habitat outcomes.
	PC5LWRP-1571	Support in so far	The amendment is consistent with Part 2 of the RMA and

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	15B.4.19	as it is consistent with our submission	for the reasons set out in the submission
	PC5LWRP-1597 Policy 15B.4.20	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality.
	PC5LWRP-1609 15B.4.23	Support in so far as it is consistent with our submission	Improves the clarity of this policy in achieving outcomes for the reasons set out in the original submission
	PC5LWRP-1605 15B.4.24	Support in so far as it is consistent with our submission	For the reasons set out in the submission.
	PC5LWRP-1608 15B.4.25	Support in so far as it is consistent with our submission	For the reasons set out in the submission.
	PC5LWRP-1575	Support in so far	For the reasons set out in the submission.

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	15B.4.26	as it is consistent with our submission	
	PC5LWRP-1653 Rule 15B.5.7	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2741 15B.5.15	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2748 15B.5.16	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2749 15B.5.18B	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	PC5LWRP-2742 15B.5.19	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2750 15B.5.20	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2743 15B.5.25	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2751 15B.5.26	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2744 15B.5.30	Support in so far as it is consistent with our	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
		submission	with achieving policy 15B.4.23
	PC5LWRP-2752 15B.5.31	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2745 15B.5.34	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2753 15B.5.35	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2746 15B.5.39	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2754	Support in so far as it is consistent	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality.

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	15B.5.40	with our submission	The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2747 15B.5.44	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-2755 15B.5.45	Support in so far as it is consistent with our submission	This would be consistent with NPSFM objective and policy requirements to set limits to maintain water quality. The additional matter for control/discretion is consistent with achieving policy 15B.4.23
	PC5LWRP-1614 Table 15B(b)	Support	This will achieve water quality outcomes in these waterbodies. It is consistent with the NPSFM and will provide for the life supporting capacity of water.
	PC5LWRP-1671 Amend Table 15B(d)	Support	This will achieve water quality outcomes in these waterbodies. It is consistent with the NPSFM and will provide for the life supporting capacity of water.
	C5LWRP-1682 Schedule 7 Farm	Support	This will achieve water quality outcomes in these waterbodies. It is consistent with the NPSFM and will

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	Environment Plan Amendments		provide for the life supporting capacity of water.
	PC5LWRP-1678 Schedule 27	Support	This will achieve water quality outcomes in these waterbodies. It is consistent with the NPSFM and will provide for the life supporting capacity of water.
	PC5LWRP-1717	support	The maps provide certainty to users. The additional maps on showing distribution of Canterbury mudfish and distribution of Lowland Long Jawed Galaxias provided with the original submission should also be added into the plan and referenced within consent requirements.
North Canterbury Fish and Game 65939	Entire submission	Support	Reasons outlined in Fish & Game submission
	PC5LWRP-691	Support	The amendment sought improves the robustness of the policy and for the reasons set out in the submission.
DairyNZ 52271	PC5LWRP-213 New definition Loss Rate Assessed as Good	Oppose	Such a provision would be inconsistent with NPSFM objective and policy requirements to set limits to maintain water quality.

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	Management Practice'		
	PC5LWRP-214 New definition 'Loss Rate Assessed as Baseline GMP'	Oppose	Such a provision would be inconsistent with NPSFM objective and policy requirements to set limits to maintain water quality.
Dairy Holdings Limited 53683	PC5LWRP-183 Policy 4.38AA	Oppose	The amendment sought will not achieve water quality outcomes or safe guard the life supporting capacity of water
	PC5LWRP-188 New policy	Oppose	The amendment sought will not achieve water quality outcomes or safe guard the life supporting capacity of water
	PC5LWRP-191 Policy 15B.4.17	Oppose	The amendment sought will not achieve water quality outcomes or safe guard the life supporting capacity of water
	PC5LWRP-194 4.41DD	Oppose	It is inappropriate for the information suggested to be included within a policy

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
	PC5LWRP-246	Oppose	This policy is unnecessary and would inappropriately constrain any review undertaken by ecan
Barrhill Chertsey Irrigation Scheme 56731	PC5LWRP-673 New policy	Oppose	The amendment sought will not achieve water quality outcomes
Nga Rūnanga and Te Rūnanga O Ngāi Tahu 67166	PC5LWRP-764 Insert new Policy under 'Nutrient Management' as follows:	Support	Consistent with the objectives of the land and water plan
Hunter Downs Development Company Limited 67154	PC5LWRP-90 4.36 Include a new clause	Oppose	The amendments sought are inappropriate and create uncertainty and ambiguity
Fertiliser Association of New Zealand 51972	PC5LWRP-1148 'Certified Nutrient Management Adviser'	Support to the extent consistent with our submission	Refer to our original submission on the definition for "Certified Farm Environment Plan Auditor"

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
Horticulture New Zealand 57998	PC5LWRP-1583 'Farm Environment Plan'	Oppose	The requirements of a farm plan are already set out in Schedule 7. Including the definition is inappropriate and creates uncertainty and ambiguity
Fonterra Co-operative Group Ltd & Others 67200	PC5LWRP-1854 'Loss Rate Assessed as Good Management Practice' PC5LWRP-1857 'Loss Rate Assessed as Baseline GMP'	Oppose	The definitions sought are inappropriate and create uncertainty and ambiguity
	PCLWRP-1076 Rule 5.46A	Oppose	The activity status of discretionary is more appropriate as there may be circumstance where it is appropriate that consent may be declined. Therefore the proposed change in activity status is opposed.
Rangatahi Downs Land Trust	PC5LWRP-2350 'Recognised Farm	Oppose	This definition is inappropriate and creates uncertainty and

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
67185	Management Programme'		ambiguity
	PC5LWRP-2410 'Change of land use'	Oppose	This definition is inappropriate and creates uncertainty and ambiguity
	PC5LWRP-2352 Amend definition of winter grazing as follows:	Oppose	This definition is inappropriate and creates uncertainty and ambiguity. In addition the changes sought would not achieve water quality outcomes.
	PC5LWRP-2319 4.11	Oppose	Part A policies to be retained as per our original submission and for the reasons set out therein.
Maungatahi Farm Limited 53936	PC5LWRP-2542 New definition for Recognised Farm Management Programme	Oppose	This definition is inappropriate and creates uncertainty and ambiguity

F&B supports or opposes the submission of:	The particular parts of the submission F&B supports or opposes:	Support or oppose submission point	Reasons
Forrester J and R 67190	PC5LWRP-2465 New definition for Recognised Farm Management Programme	Oppose	This definition is inappropriate and creates uncertainty and ambiguity
Irrigation New Zealand Inc & Others 53910	PC5LWRP-2132 New Policy	Oppose	Good management practices alone will not ensure water quality. The application of this policy risks being inconsistent with achieving the NPS on Freshwater. The detail describing the methods that will be used to implement the good management practices should either be set out within the schedule of this plan or as part of the consent information requirements.