

**From:** [Robert Devlin](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission to Plan Change 7  
**Date:** Monday, 9 September 2019 10:19:13 AM  
**Attachments:**

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Please find attached my submission to Plan Change 7

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Sent from [Outlook](#)

# Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Submitter ID:

File No:

**Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 5 of Schedule 1 of the Resource Management Act 1991**

**Return your signed submission by 5.00pm Friday 13 September 2019 to:**

Proposed Plan Change 7 to the Land and Water Regional Plan

Environment Canterbury P O Box 345 Christchurch 8140

Email: [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

**Full Name:** Robert Devlin \_\_\_\_\_ **Phone (Hm):** 03 313 0980  
**Organisation\*:** \_\_\_\_\_ **Phone (Wk):** \_\_\_\_\_  
 \* the organisation that this submission is made on behalf of  
**Postal Address:** 21 Kensington Ave Rangiora \_\_\_\_\_ **Phone (Cell):** 027 3639623  
 \_\_\_\_\_ **Postcode:** 7400  
**Email:** bob-margaretdevlin@outlook.co.nz \_\_\_\_\_ **Fax:** \_\_\_\_\_  
**Contact name and postal address for service of person making submission** (if different from above):

## Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

**Please tick the sentence that applies to you:**

I could not gain an advantage in trade competition through this submission

***If you have ticked this box please select one of the following:***

I am not directly affected by an effect of the subject matter of the submission

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

I do not wish to be heard in support of my submission

☐  
☐  
☐

s u b m i s s i o n a t a n y h e a r i n g

**(1)** The specific provisions of the Proposed Plan that my submission relates to are:

**(2)** My submission is that:

*(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)*

**(3)** I seek the following decisions from Environment Canterbury:

*(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)*

Section &  
Page Number

Sub-section/  
Point

Oppose/support  
(in part or full)

Reasons

PC7 part a Omnibus				
p15	Habitats of indigenous freshwater species	support	Applaud the development of Fish passages and the Restrictions on activities causing damage to fisheries.	
17		support	Applaud Inclusion Ngai Tahu values	
17	Salmon spawning sites Bathing sites	Support	Applaud increase in identified spawning sites	
		support	Applaud Increase in identified swimming sites	
18	Ngai Tahu outcomes – waipuna sites be mapped on farm plans	support	Applaud the recognition of waipuna values	Is mapping alone sufficient? Fencing off and protection should be included.
18-19	MAR require consent	support	Applaud aims to reduced contamination Applaud increased flow aims	
20	Commercial vegetable growing	support	Applaud nitrogen limits	
21	Hinds drains stock exclusions	support	Applaud stock exclusions	
21	Hinds drains set flow and allocation limits	support		
Orari Temuka Opihi Pareora				
24-26	Rock Art Management sites	support	Applaud recognition and value of Rock Art	
	Winter grazing restrictions	support	Applaud reductions in winter grazing rights	De-nitrification walls should be part of the consent process for winter grazing.
	Cultural allocation of water	support	Applaud value placed on waipuna	
26	Managing nitrate limits	support	Applaud aims but look forward to faster implementation and greater percentage reductions	Look forward to faster implementation and greater percentage reductions
29-30	Stock exclusions	support	Applaud but expect more stringent application	

32	Phasing out of over allocation of water rights	support	Applaud recognition of the need to increase minimum flows	
	Consents limited to 10 years in areas where further reductions in nitrogen loss are required	Support	Applaud the limiting of consents	
Waimakariri				
	Managing nitrate limits	Support proposals	Applaud improvements expected for drinking water wells	The De-nitrification Wall experiment in Silverstream/Kaiapoi should be celebrated. Concern is expressed about the water quality in Mill Stream Keetly Place bridge Ohoka Village, where between July and September 2019 there was a noticeable increase in “cloudy” water. The two fish usually seen upstream from the bridge can no longer be seen. There has been a noticeable increase in Industrial / construction activity up stream of the bridge, which may have caused the stream water discoloration. De-nitrification walls, with annual audits reported to the Parliamentary Commissioner for the Environment, should be part of the consent process for dairy units.
41-49	Stages in reduction of nitrates	Support	Applaud the ten year interval and accumulated percentage reductions	But question whether this is fast enough and are the percentage reductions great enough, given the rising nitrate levels in the water and concerns over Christchurch water supply.
42-49	Capping current allocation and prohibiting new abstraction	Support	Applaud protection of spring fed streams	
42-49	Minimum flows increased over time	Support	Applaud protection of Waimakariri tributary streams and the Ashley River	Are the time frames sufficiently soon enough?
42-49	Targeted stream augmentation	Support	Applaud the decision to help stream health	
43-49	Catchment restoration activities	Support	Applaud restored indigenous bio-diversity	
44-49	Te Aka Aka Coastal Protection Zone	Support	Applaud consent requirements for farming activities in this protection zone.	Concern is also expressed over storm water discharge into Pegasus Lake and the Taranaki Stream. The frequency of contact water sport prohibitions on Lake Pegasus makes a mockery of

				environmental protection. Suggest tightening of Consent requirements for both farming and residential development in the Protection Zone eg Pegasus, Waikuku, Ravenswood, Woodend.
45-46	Stock exclusions	Support	Applaud all water bodies on the plains, land below 350m elevation, should be stock free.	

## Notes

This writer's submission in 2011 about water issues expressed concerns about consents being granted without proper research done on the impact on hydro-geologic water (deep underground). Those concerns are still valid, but the writer acknowledges the research that has been done.

The steps outlined in the Plan Change 7 are commendable, but there will still be damaging nitrate discharges. Once the deep underground water becomes contaminated, it will take years to undo the damage. On the western shores of Lake Taupo the nitrate accumulation took 30 years to become noticeable. Allowing a higher nitrate level in Christchurch water is unacceptable to this writer.

The United Nations Millennium Development Goals have provided a model for the Targets suggested for use in this Plan change. One would hope that the latest thinking in United Nations Sustainable Development Goals will also apply. An example could be seen in allowing the nitrate levels to rise in Christchurch city water supplies, with a consequent probable rise in public health issues 10, 20, 30, 50 years time in the form of increasing population with cancers or other health issues. This could be said to be an unsustainable development goal. All targets should be analyzed in terms of whether they are sustainable targets. Does the Council have a sustainability officer? Does Council have to report to the Parliamentary Commissioner For the Environment on sustainability matters?

Further to sustainable goals, if the possible rising bankruptcy rate and possible rising suicide rate in the farming community, that has been talked about and is attributable to Plan Change 7, occurs, then that has to be measured against the possible cost to community of not doing anything about nitrates in water. It

may mean that future consents have this acknowledged and that the Council is prepared to do something to support the farming community.

The De-nitrification Wall experiment in Silverstream/Kaiapoi should be celebrated. Concern is expressed about the water quality in Mill Stream Keetly Place bridge Ohoka Village, where between July and September 2019 there was a noticeable increase in "cloudy" water. The two fish usually seen upstream from the bridge can no longer be seen. There has been a noticeable increase in Industrial / construction activity up stream of the bridge, which may have caused the stream water discoloration. De-nitrification walls, with annual audits reported to the Parliamentary Commissioner for the Environment, should be part of the consent process for dairy units.

Concern is expressed over storm water discharge into Pegasus Lake and the frequency of contact water sport prohibitions. Suggest tightening of Consent requirements for residential development eg Pegasus, Waikuku, Ravenswood, Woodend. Concern is expressed over the inactive solar bee on Pegasus Lake.

This submitter is heartened by the raft of commendable changes in caring for the environment. The targets are written in such a way that they can be easily changed to meet new requirements of central government.