

**From:** [Arthur McGregor](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Tuesday, 10 September 2019 9:10:13 PM

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E te rangatira, tena koe,

I am writing to make a submission on Plan Change 7 to the LWRP. I do not wish to speak to my submission. I could not gain an advantage in trade competition through this submission.

### **Part A - omnibus**

I fully support the rule changes relating to the following:

- Preventing loss of habitat for indigenous freshwater species, because this will help prevent further loss to the number of threatened fish species
- Improving recognition of values and locations significant to Ngai Tahu as iwi whakaruruhau
- Protecting water quality for areas used for freshwater bathing, to improve recreational outcomes for all

### **Part B - Orari-Temuka-Opihi-Pareora area**

I fully support the rule changes relating to the following:

- Managing Culturally Significant Sites, Freshwater Mataitai and Mahinga Kai Enhancement
- Capping allocations at existing levels and reducing in time to meet freshwater outcomes
- Increasing minimum flows in rivers and adopting partial restrictions to avoid the minimum flow from being breached
- Phasing out over-allocation of our precious water resources

### **Part C - Waimakariri area**

I fully support the rule changes relating to the following:

- Allocating water for mahinga kai enhancement and other catchment restoration activities
- Extending stock exclusion rules
- Additional protection in the Ta Aka Aka/Coastal Protection Zone
- Phasing out over-allocation of our precious water resources
- Increasing minimum flows in rivers and adopting partial restrictions to avoid the minimum flow from being breached

I am concerned that the plans to reduce nitrate leaching the the 'Nitrate priority area' are insufficient to protect Christchurch's drinking water. As a Christchurch resident I have become increasingly aware of how valuable our drinking water resource is, with the introduction of chlorination to our drinking supply. I feel it is irresponsible of us not to take strong action to ensure that Christchurch retains its pure drinkable water long into the future. I would thus like Plan Change 7 to be strengthened in this regard to ensure we maintain or improve the quality of the Christchurch drinking water aquifers.

I would like to add my support to the following points, taken from <https://thecommongood.kiwi/pc7-submission/>, which provide some further detail and supporting evidence to my concerns.

- I consider the implications of nitrate leaching in the Waimakariri ‘Nitrate priority area’, which is modelled to result in a nitrate level of 3.8 mg/l, poses an unacceptable risk to the drinking water of current and future Christchurch citizens.
- I consider that the implication for future nitrate pollution of Christchurch’s drinking water is inconsistent with the following Strategic Policies in the Land and Water Regional Plan:
  - 4.4 Groundwater is managed so that: ...e. Overall water quality in aquifers does not decline
  - 4.5 Water is managed through the setting of limits to safeguard the life-supporting capacity of ecosystems, support customary uses, and provide for community drinking-water supplies and stock water, as a first priority...’.
- I consider the nitrate reduction rules should require appropriate reductions in the ‘Nitrate priority area’ which will maintain or improve the current quality of the Christchurch drinking water aquifers as is required under the NPS for Freshwater.
- The decisions we make today will have serious and lasting implications for current and future generations and I believe it is entirely inappropriate for the activities of private individuals and enterprises to put at risk the drinking water of nearly 400,000 people, with population projections estimating 500,000+ by the time nitrate contamination levels are expected to reach 3.8 mg/l.
- The economic assessments, which informed PC7, state: “The total reduction from Current Pathways to the Solutions Package will be approximately \$5.8 million in operating profit, and \$5.7 million per annum in regional GDP” and appear to have a minor impact (0.3%) on the \$1.57 billion GDP for the Waimakariri district.
- I consider that economic externalities must be taken into account alongside farm operating surplus assessments, such as the cost to younger and future generations if they are faced with needing to treat their drinking water or source alternative supplies. The future cost to the Christchurch public is likely to vastly exceed that of any short term economic impact on farm profits.
- I strongly support a science-based precautionary approach to both the protection of human health and the protection of Christchurch’s drinking water sources, which rely on functional, healthy aquifer ecosystems.
  - Graham Fenwick (NZ’s leading groundwater ecosystem scientist) suggests in his evidence to the Te Waikoropupu springs WCO hearing a trigger value of 0.4–0.5 mg/l as a precautionary value to ensure ecosystem health.
  - Chris Hickey (NZs leading ecotoxicologist) recommends in his evidence to the Te Waikoropupu springs WCO hearing that where long lag times apply, a management limit of 0.55–1.1 mg/l is appropriate (Hickey considers a ‘long time lag’ to be 8 years, whereas in the lag effects for the Waimakariri ‘Nitrate priority area’ is modelled as being 50+ years).
  - I would like to see limits set in the life of this proposed plan that achieve those ranges of limits suggested as part of the Te Waikoropupu springs WCO hearing.
- In Graham Fenwick’s presentation to commissioners on behalf of Wellington Regional Council in 2018 he states: “Available research evidence empirically demonstrates that this standard [NZ Drinking Water Standard], designed to protect human health, is inappropriate for ensuring the health of aquatic ecosystems and invertebrates under long-term exposure.”
  - In light of Fenwick’s and Hickey’s findings mentioned above, it is clear that further to being inconsistent with policies 4.4 and 4.5 the proposed nitrate limit of 3.8 mg/l will not provide for the ecosystem health of the Christchurch drinking water aquifers.
- Even though the biodiversity within New Zealand’s aquifers is poorly known, the New Zealand Conservation Act 1987 and the New Zealand Biodiversity Strategy requires regional councils to ensure that the intrinsic and other values of all

biodiversity (including that of “underground aquifers”) are adequately maintained and safeguarded for future generations.

- The ecosystem services delivered by groundwater biodiversity are integral to sustaining groundwater and surface water resources, cultural identities and economies at local, regional and national levels.
- The Resource Management Act 1991 (and amendments) requires regional councils to ensure the sustainability of these ecosystem services (safeguard “the life-supporting capacity of air, water, soil, and ecosystems” by “avoiding, remedying, or mitigating any adverse effects of activities on the environment” to ensure that the needs of future generations are met.).
- The NPS-FM Appendix 1 sets out national values and uses for freshwater, which explicitly includes “aquifer” as one “freshwater body type”. These compulsory national values for ecosystem health are:
  - The freshwater management unit supports a healthy ecosystem appropriate to that freshwater body type (river, lake, wetland, or aquifer).
  - In a healthy freshwater ecosystem ecological processes are maintained, there is a range and diversity of indigenous flora and fauna, and there is resilience to change.
  - Matters to take into account for a healthy freshwater ecosystem include the management of adverse effects on flora and fauna of contaminants, changes in freshwater chemistry, excessive nutrients, algal blooms, high sediment levels, high temperatures, low oxygen, invasive species, and changes in flow regime. Other matters to take into account include the essential habitat needs of flora and fauna and the connections between water bodies.
- For these reasons, I consider that the aquifer ecosystem which provides Christchurch’s drinking water requires specific protection, greater than that is afforded in the current plans rules for nitrate reductions.
- I do not believe that because the modelled nitrate pollution is 50+ years away, that it is of any less immediate concern (particularly because ECan’s monitoring shows the northern bores are already showing increasing nitrate levels – in line with the model’s predictions). Younger and future generations will be facing much greater challenges in the form of climate disruption and all the social, cultural, environmental and economic issues associated with such disruption. The least we can do is provide them a safe, ecologically functional water supply, just like we enjoy today.

Finally I would like to make some general closing remarks. I am pleased with the majority of the proposals in Plan Change 7 which are all positive, although in some areas do not go far enough. I feel these changes are a step forward towards improving the state of our freshwater in Canterbury, improving our commitment to Te Tiriti o Waitangi, and allowing our biodiversity to flourish.

Thank you for considering my submission.

Naku noa,  
na Arthur McGregor

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