

From: [Kyle Sutherland](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Tuesday, 10 September 2019 10:43:19 PM

Hi there,

Please see attached submission on PC7 and PC2.

Please confirm this has been received.

We could not gain an advantage in trade competition through this submission.

We would like to make a verbal submission

Cheers

Kyle Sutherland

Community Facilitator

Community Capability and Capacity Building OARC Activation & Transitional Use Facilitation

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Avon-Otakaro Network Submission - Plan Change 2 & Plan Change 7 09/09/19

AvON's main concerns are that these Plan Changes do not go far enough to protect the Ōtākaro Avon River from a consequent impact on ecological health and mahinga kai values, nor does it protect human health and wellbeing of the surrounding communities which rely on these mahinga kai values. We request that freshwater outcomes be set at a stronger level which meets social, cultural and environmental/ecological values.

Indigenous Freshwater Species:

We **strongly support** the introduction of additional protection for indigenous freshwater species and their habitat.

We **strongly support** the introduction of additional structures enabling safe passage of indigenous freshwater species.

Mahinga Kai Values:

We **strongly support** greater recognition of mahinga kai values and the protection of sites of significance to Ngāi Tahu, including wāhi tapu (sacred sites), wāhi taonga (treasured sites) and waipuna (springs).

Nitrates:

Canterbury needs to maintain low concentrations of nitrate nitrogen in the deep aquifer bores supplying Christchurch, and in shallow groundwater that feeds spring-fed streams such as the Ōtākaro Avon River. The health of the Ōtākaro Avon River is already under threat from current land use practices with the timelag of current nitrates "in the post". We need immediate action to protect the values of the river.

AvON has concerns for the low nitrate reduction targets and the length of time until PC7 requires the targets to be met. Environment Canterbury has selected the nitrate management targets based on 50th percentile model predictions and not the more conservative 95th percentile predictions.

We consider that the implication for future nitrate pollution of Christchurch's groundwater and aquifers 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...’.

We **strongly support** a science-based precautionary approach to the protection of Canterbury urban waterways such as the Ōtākaro Avon River, 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). We 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.

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 aquifers. We consider that the aquifer ecosystem which the Ōtākaro Avon River ecosystem relies on requires specific protection, greater than that is afforded in the current plans rules for nitrate reductions.

While we support the intent of nitrate reductions, we **strongly oppose** the current targets and timeframes as they are not ambitious enough, nor timely enough to protect social, cultural and environmental/ecological values of our aquifers, groundwater and waterways which rely on them such as the Ōtākaro Avon River.

Waimakariri Rules – Section 8, Schedule 8 Region Wide Water Quality Limits

Water quality targets set in the Rivers, Lakes and Groundwater tables are too high. We **strongly oppose** the targets set under Schedule 8 and recommend thresholds are lowered in line with up to date research on effects of water quality attributes on human health and ecosystems, NPS limits and relevant ANZECC 2000 Guideline values and outcomes sought by the community.

Freshwater Outcomes for Canterbury Rivers – Section 4 (15) Table 1a

For E. coli levels for urban waterways the level of 1200 puts the 95th percentile value in the ‘D’ category of the current National Policy Statement for Freshwater Management. This should be reduced from 800 rather than 1200.

We **oppose** the Freshwater Outcomes for Canterbury Rivers as there needs to be much stronger water quality outcomes.

Abstraction of Water

We **strongly support** the caps on any new water allocation to help protect aquifers, shallow groundwater and the spring fed streams such as the Ōtākaro Avon River.

Minimum River Flows

We **strongly request** all minimum flows and associated partial restrictions are set at a level to provide for the ecological health of the stream, river, hapua (lagoons), etc. within the life of this current plan. This may require a review of all current consents.

We also **strongly endorse** the Christchurch City Council's submission on PC7 and PC2 as it goes into a much greater level of detail than we are able to.

We could not gain an advantage in trade competition through this submission.

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Kind regards,

Kyle Sutherland

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