

From: [Dave Evans](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
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Submission on Plan Change 7 To the Canterbury Land and Water Regional Plan

Name: David John Evans

Postal Address: 7 Manatu Lane, Waltham, Christchurch 8023

Email: dave.evansii@gmail.com

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

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

Part A

I support greater restrictions on activities that will improve protection for the remaining habitat of native freshwater fish and additional stock exclusion provisions for swimming sites. I also approve of the greater recognition of values (such as mahinga kai) and protection of sites of significance to Ngai Tahu.

Part B

I support the caps on any new water allocation. I also support the setting of nitrate limits for rivers and groundwater, and the policies and rules that restrict any further increase of nutrient discharges. I support higher required reductions in nitrogen losses in High Nitrogen Concentration Areas beyond “Good management practice”, but want to see greater reductions required in the life of this current plan. I request all minimum flows and associated partial restrictions provide for the ecological health of freshwater bodies within the life of this current plan.

Part C

I consider the level 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 allowance for future nitrate pollution of Christchurch’s drinking water is inconsistent with the Land and Water Regional Plan. I recommend that 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.

It is unacceptable that we expose future generations to significant health risks and/or high costs of water treatment, so that a small minority of people can make money from agricultural intensification. Future dangers are not being adequately considered in this process. I 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) has testified that a trigger value of 0.4–0.5 mg/l of nitrate is a precautionary maximum value to ensure ecosystem health. It has also been found in Denmark that nitrate levels much less than 3.8 mg/l pose a significant risk to human health. The proposed nitrate limit of 3.8 mg/l will not provide for the ecosystem health of the Christchurch drinking water aquifers, nor the health of Christchurch’s human population.

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.

Regards
Dave Evans