

From: [Marie-Louise Grandiek](#)
To: [Mailroom Mailbox](#)
Cc: [Robert Wynn-Williams](#); [Paula and Martin](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Thursday, 12 September 2019 11:39:14 AM

Good Morning

Please see attached:

1. Form 5
2. Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

If you have any queries, please do not hesitate to contact me.

Regards

Marie-Louise Grandiek

Board Support Officer | Canterbury Aoraki Conservation Board
Department of Conservation | Te Papa Atawhai
T: 64 3 3713700 | M: 027 5416663 | VPN: 5469

Christchurch Office | Otautahi

Level 3, 161 Cashel Street, Christchurch
Private Bag 4715, Christchurch Mail Centre, Christchurch 8140

Kia piki te orange o te ao turoa, i roto i te ngatahitanga, ki Aotearoa

To work with others to increase the value of conservation for New Zealanders

www.doc.govt.nz



CONSERVATION WEEK 14-22 SEP

Events and activities across Aotearoa
conservationweek.org.nz

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Submitter ID:

File No:

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

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

Full Name: Dr Robert Wynn-Williams

Phone (Hm): 03-3252155

Organisation*: Canterbury Aoraki Conservation Board

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address: Private Bag 4715, Christchurch Mail Centre,
Christchurch

Phone (Cell): 021-2568804

Postcode: 8140

Email: canterburyaorakiboard@doc.govt.nz

Fax:

Contact name and postal address for service of person making submission (if different from above):

M-L Grandiek, Board Support Officer, Department of Conservation, Private Bag 4715, Christchurch Mail Centre, Christchurch 8104

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.

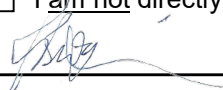
Please tick the sentence that applies to you:

- ☒ I could not gain an advantage in trade competition through this submission; or
- ☐ I could gain an advantage in trade competition through this submission.

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

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

Signature:



Date: 12 September 2019

(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; or

☐

I do wish to be heard in support of my submission; and if so,

☐

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing



Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki

Private Bag 4715, Christchurch Mail Centre, CHRISTCHURCH 8140
Tel: 027-5416663
Email: canterburyaorakiboard@doc.govt.nz

12 September 2019

Environment Canterbury
PO Box 345
CHRISTCHURCH, 8140
mailroom@ecan.govt.nz

PLAN CHANGE 7 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

Submission from:

Canterbury Aoraki Conservation Board

Te Runanga Papa Atawhai o Waitaha me Aoraki

Canterbury Aoraki Conservation Board Te Runanga Papa Atawhai o Waitaha me Aoraki (the Conservation Board) is an independent body established by the Conservation Act 1987. Made up of 12 appointed members, including four iwi representatives, the Conservation Board represents the community of interest not only in the work of the Department of Conservation (the Department) but also conservation in general within Canterbury.

The Conservation Board's main responsibility is to work with the Department to develop a conservation management strategy for our area and to oversee its implementation. The process for developing the strategy involved full public consultation and hearings and the Conservation Board believes the **Canterbury Waitaha Conservation Management Strategy 2016** (the Canterbury CMS) fairly reflects the views of the wider community. The strategy contains a vision, objectives and policies for the region which are aligned with national objectives of the Department. The strategy was signed off by the Minister of Conservation at the time and became operative in September 2016.

Objectives and policies in the Canterbury CMS are guided by a detailed vision of what Canterbury Waitaha will look like in 50 years' time (p18). By 2066:

“Flowing from the mountains to the sea, through high-country basins and across the Canterbury Plains (Ngā Pākahi Whakatekata o Waitaha), braided rivers and lowland streams with restored riparian margins connect the mountains and the sea with remnant ecosystems on the plains. These waterways and their margins are thriving, clean and healthy ecosystems highly valued by the community and recognised internationally as habitats for a diverse range of native plants and animals. Canterbury is widely known for its clean rivers and lakes”.

Canterbury's 'flourishing kete' supports a range of opportunities for hunting and gathering activities that are important to the ongoing expression of Ngāi Tahu and the community's identity"

"Partnerships with Ngāi Tahu and community-based programmes are responding to challenges posed by aquifer degradation by restoring the mauri, ecosystem health, mahinga kai and recreational use of waterways. Te Waihora, Wainono Lagoon and other hāpua and estuaries, and numerous high-country lakes and wetlands are healthy as a result of good management."

The Conservation Board believes this vision is shared by most Canterbury people. It is the Conservation Board's view that all organisations and individuals making decisions affecting freshwater resources should be asking themselves if each of their decisions supports steady incremental progress towards this outcome.

The vision will become reality as the Department achieves objectives in the Canterbury CMS. In places where water bodies are surrounded by public conservation land the Department is often able to directly manage these places to achieve the outcomes sought. However, for most of Canterbury's water bodies the Department has limited powers and can only seek to influence the many other organisations and individuals who make decisions affecting freshwater.

Canterbury CMS Natural Heritage Objective 1.5.1.6 addresses freshwater systems and states [the Department will]:

"Work with landowners, Ministry of Primary Industries, fish and game councils, local government and other agencies, and advocate for:

- a) the protection of freshwater fisheries, fish habitat and fish passage;*
- b) the preservation of threatened indigenous freshwater species; and*
- c) the maintenance and improvement of habitat connectivity and water quality, from the headwaters of waterways to the coast."*

The Department's detailed submission on Plan Change 7 is entirely consistent with this objective and the **Conservation Board completely supports the Department's submission** including the detailed amendments sought which are all aimed at making the vision reality by 2066, preferably before.

Additional Comments

1. The Conservation Board generally supports the intent and direction of proposed changes to the Canterbury Land and Water Regional Plan.
2. The Conservation Board strongly supports the mapping of high value *Habitats of Indigenous Freshwater Species* being included in the plan together with a requirement for consent for otherwise-permitted activities within these areas. Assessment and decision-making on a case by case basis should help maintain and enhance existing habitat and ecosystem health and should increase the likelihood of long-term survival of indigenous fish and other freshwater species populations in these locations.

However nearly all of Canterbury's waterways and water bodies provide habitat for at least some indigenous freshwater species. The Conservation Board is concerned that by providing some protection for the best remaining native fish habitat the new rules send a message that what happens to native fish populations outside the high value areas is less critical. It is the Conservation Board's view that the Land and Water Regional Plan must include additional provisions which enable the continued survival of remaining populations of native fish where-ever they occur in waterways and water bodies throughout Canterbury.

3. While fully supporting policies requiring damage to indigenous habitats to be avoided, the Conservation Board is very uneasy about the alternative use of new habitat creation being used to offset damage to indigenous habitat. Freshwater ecosystems are complex and not fully understood. Natural processes occur which support ecosystem functioning and health which cannot be re-created. It is better by far to protect and restore what remains than attempting to re-create new freshwater habitat. The Conservation Board seeks the deletion of new habitat creation off sets from the policy. The Conservation Board's view is that if this alternative exists in the policy statement it is more likely damage to existing indigenous habitat will be the outcome.
4. The Conservation Board supports new provisions designed to protect waipuna throughout Canterbury, including the requirement for farmers to identify springs on their property and describe actions to minimise adverse effects in their Farm Management Plans.

The Conservation Board supports increased recognition of Ngāi Tahu values (rights and interests) and sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga. Amendments to 23 rules requiring consideration be given to how Ngāi Tahu values will be affected when resource consent decisions are made, are supported.

5. New environmental flow and allocation regimes and higher minimum flows proposed for the Orari-Temuka-Opihi-Pareora Zone are welcomed and supported, but the Conservation Board is concerned that the rate of staged implementation will not be rapid enough to support the timely restoration of full ecological health and mauri in affected waterways. It is disappointing the measures proposed to improve water quality in the High Nitrogen Concentration Areas are not likely to even begin to take effect for over 10 years. The Conservation Board seeks amendments effective in speeding up the recovery process for waterways in the Zone. The longer these freshwater ecosystems are functioning under highly modified conditions, the more likely remaining indigenous species will become locally extinct and the longer it will take for ecosystems to make a full recovery. In some places full recovery may not be possible at all if improvement doesn't happen fast enough.
6. Similarly, in the Waimakariri Zone, the Conservation Board supports the specific nutrient regime and increasing minimum flows over time as allocation is scaled back but is not convinced the rate of change will enable full freshwater ecosystem recovery and restoration of the mauri of affected waterways. The Conservation Board seeks the timetable for incremental improvement be amended so that new rules become operative sooner.

The Conservation Board supports identification of the *Te Aka Aka Ashley Estuary and Coastal Protection Zone* where consent will be needed for activities permitted elsewhere in the Waimakariri Zone. This recognises that assessment and decision-making on a case by case basis is likely to result in better ecosystem health outcomes in this area of high ecological and cultural value.

7. The Conservation Board welcomes a better definition of fish passage and new policies related to indigenous fish passage. In particular we welcome and fully support Policy 4.102 which requires that within the mapped *Habitat of Indigenous Freshwater Species*, all structures “enable the safe passage of indigenous fish, while avoiding as far as practicable, the passage of any invasive, pest or nuisance fish species by: the appropriate design, construction, installation and maintenance of new in-stream structures; and the modification, reconstruction or removed (sic) of existing in-stream structures.”

The Conservation Board strongly supports the protection of remaining salmonid-free freshwater ecosystems and the exclusion of introduced predatory fish from additional waterways as part of a strategy to support the long-term survival of indigenous fish species in all Canterbury waterways. The Conservation Board seeks this policy remains unaltered.

8. The Conservation Board notes the identification of additional freshwater bathing sites in Canterbury and welcomes the focus on providing for safe swimming at such places at all times. The Conservation Board is particularly concerned about deteriorating water quality in streams at popular camp sites on public conservation land at Waihi Gorge and Otaio Gorge. Proposed new rules which prohibit stock from waterways upstream of these sites are welcomed and supported.

The Conservation Board acknowledges all the work by staff, zone committees, and elected members behind proposed Plan Change 7, and congratulates Environment Canterbury for producing the draft.

Thank you for the opportunity to comment.

The Conservation Board expects reporting staff to support and recommend the improvements sought in this submission and requests decision-makers amend proposed Plan Change 7 accordingly, for the reasons given.



Dr Robert Wynn-Williams

Acting Chairperson

Canterbury Aoraki Conservation Board

Te Rūnanga Papa Atawhai o Waitaha me Aoraki