



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

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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

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Organisation*: _____

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* the organisation that this submission is made on behalf of

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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; 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: 11-9-19.

(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

Submission on Proposed Plan Change 7 to the LWRP

11th September 2019

The specific provisions of the Proposed Plan that my submission relates to is: section 8.5.24 page 82.

We own a 340ha Sheep and Beef Property which is within the proposed TPZ in the Fox's Creek Catchment where the creek enters and exits the property twice.

Our Submission is as follows:

Ashley Estuary (Te Aka Aka) and Coastal Protection Zone (TPZ)

- (a) The TPZ was not a Waimakariri Zone Committee (WZC) initiative and it was introduced AFTER both Ecan and Waimakariri District Council (WDC) has approved the Zone Implementation Plan Addendum in December 2018. A drop-in session was held for potentially affected landowners on 27th August 2019, however with submissions due by 13th September 2019 it provided little time for landowners to understand the proposal and prepare a submission. It is a very busy time for farmers with lambing and calving, and the process of preparing a submission is very difficult and time-consuming.

I therefore **OPPOSE** the proposal in full for the following reasons;

- a) The technical report "Assessment of Ashley Estuary (Te Aka Aka) and Coastal Protection Zone is dated 8th May 2019 when the preparation of draft PC7 was virtually finalised. It brings into question whether the Ecan experts who prepared the report were provided sufficient time to properly consider the issues in the area and the best way to address these. The TPZ was introduced at the last minute, excluding any involvement from the WZC and the communities affected.
- b) The Canterbury Water Management Strategy is supposed to be a collaborative process and the communities should have been consulted on the proposed zone. All through this process the feedback and ground-truthing that has come from other communities of Waimakariri has been invaluable in identifying issues and has been considered in the proposed solutions. This critical component is missing from the development of TPZ.
- c) The purpose of the collaborative process is to enable engagement with landowners by being up-front about what the issues are and what solutions are being proposed, so that landowners understand and support taking the actions required to make improvements. Introducing the TPZ at the last minute without consulting with the affected communities is not conducive to forming good relationships with landowners to bring about the changes needed.

Hill-fed Streams

Our concern is mainly with the hill-fed streams, as the technical report appears to give them little consideration. The "Current State" reporting identified that, while the Ashley hill-fed streams have high fine sediments at most sites, it is not possible to determine the drivers of degraded ecosystem health and drought is likely to be a factor. It was concluded that not enough data was available to draw robust conclusions and further research was required.

Forestry – There is forestry at the head of Fox’s Creek (and other TPZ hill-fed streams) which can have significant impacts on both water flow, quantity and sediment in the water. Forestry Harvest in 2014 and 2015 on either side of Fox’s Creek, would have caused considerable amount of sediment into the creek, dwarfing any impact of farming.

Shingle – A number of locals have observed that shingle is an issue on Fox’s Creek. It is not known specifically where it is coming from, however winter crop grazing and irrigated paddocks don’t produce shingle. Research is required to identify the source and possible solutions which may involve creek engineering and bank protection works. Expert advice is required for this and it shouldn’t be left to the individual farmer to try and deal with this in isolation, at potentially a massive cost.

The technical report section 4 notes that “Broadscale ecosystem health in Te Aka Aka will more than likely remain limited by nitrogen as it is the major driver of ecological degradation in the estuary”. And further “there is still the broadscale nitrogen loading occurring in the Ashley River/Rakahuri Catchment and in the catchment of the spring fed streams and creeks, which is likely to result in the same eutrophication susceptibility conditions, ie increased eutrophication over time.” The report further notes that the proposed zone MAY decrease LOCALISED contaminant loadings, which MAY benefit the health of estuary communities in these LOCALISED areas. This uncertainty is perhaps a reflection that not enough is known about the proposed zone, and hill-fed streams in particular, to determine what solutions are required.

The proposed winter grazing rules under section 8.5.24(3)(b) are already strictest in Canterbury and there is insufficient justification to increase them further. If there are specific concerns Ecan will still have the right to request a copy of any farmer’s Farm Environment Plan under the permitted activity rule. The WZC is also keen to progress sub-catchment management plans across the Waimakariri Zone, as a preferred way to identify issues and promote community involvement in finding and auctioning solutions.

We are therefore specifically **opposed** to the inclusion of hill-fed streams in the TPZ.