

**From:** [julia\\_rambacher](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Friday, 13 September 2019 1:01:40 PM  
**Attachments:** [Submission on Plan Change 7.docx](#)

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Kia ora,

Please find the submission from the Styx Living Laboratory Trust attached.

Kind regards,

**Julia Rambacher**

*Chairperson*

*Styx Living Laboratory Trust*

<https://www.thestyx.org.nz/environmental-monitoring>

Phone: 02108620568



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

Submitter ID:

File No:

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: Julia Rambacher Phone (Hm): 02108620568

Organisation\*: Styx Living Laboratory Trust Phone (Wk): n/a  
\* the organisation that this submission is made on behalf of

Postal Address: 158 Palmers Rd, New Brighton Phone (Cell): 02108620568

Postcode: 8083

Email: juliarambacher3@gmail.com

Fax: n/a

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: 13/09/2019

(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

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that:  (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(3) I seek the following decisions from Environment Canterbury:  (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Whole Document		<b>Supports</b>	The Styx Living Laboratory Trust generally supports the intention and direction of proposed changes to the Canterbury Land and Water Regional Plan and thanks Environment Canterbury for the opportunity to comment.	No action required.
<b>PART A OMNIBUS</b>  Habitats of Indigenous freshwater species		<b>Strongly supports</b>	supports the mapping of Indigenous Freshwater Species Habitats being included in the plan. This should provide greater clarity regarding the values of each area.	No action required.
		<b>Strongly supports</b>	stock exclusion, and the required assessment of potential effects of water abstraction on Indigenous Freshwater Species Habitats.	No action required.
		<b>Strongly supports</b>	the safe passage of indigenous fish as discussed in 4.102	No action required.
		<b>Opposes</b>	Parts A and B of 4.101.  A-Mitigation is not strong enough	Mitigation will still allow for sediment discharges, vegetation clearance, excavation and deposition of material, or other disturbance in a surface water body to still occur and therefore, there will still be effects on Indigenous Freshwater Species Habitats but they will simply be 'mitigated.' Therefore, stronger provisions are required.

Add further pages as required – please initial any additional pages.

		B- Opposes the new habitats creation offset policy.	We do not support the creation of new habitats as a mechanism to offset habitat destruction. Freshwater ecosystems are complex and this provision will allow for the destruction of valuable Indigenous Freshwater Species Habitats as long as a new habitat is created. This created habitat would not necessarily exhibit the same values as the natural habitat and we worry that it would create a precedent for the destruction of our current valuable Indigenous Freshwater Species Habitats.
Ngāi Tahu	<b>Strongly supports</b>	the improved recognition of values and sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga sites.	No action required.
	<b>Strongly supports</b>	new provisions designed to protect waipuna including the integration of these sites into Farm Management Plans.	
Freshwater Sites	<b>Strongly supports</b>	schedule 6 particularly the stock exclusion to help increase the water quality at these sites.	No action required.
Salmon Spawning Sites	<b>Supports</b>	schedule 17 with the identification of Salmon Spawning sites.	No action required.
National Direction	<b>Strongly supports</b>	the alignment with the National Policy Statement for Freshwater Management.	No action required.
<b>Part C: WAIMAKARIRI</b> Nitrate priority areas, minimum flows and allocation	<b>Partially supports</b>	the specific nutrient regimes and the increasing of minimum flows over time as allocation is scaled back.  <b>Notes</b> that the proposed staged implementation of changes occurs over a long duration and the timetable should be amended so that proposed changes can become operative sooner.	A speedier implementation is needed for a timelier restoration to full ecological health and mauri in effected waterways so that these ecosystems do not decline further during the staged implementation. The Trust seeks an amendment of the timetable for improvements so that the proposed changes can become operative sooner.

Mahinga kai enhancement	<b>Strongly supports</b>	the allowance of water allocation for mahinga kai enhancement.	No action required.
Stock exclusion	<b>Strongly supports</b>	greater provisions around stock exclusion from waterways.	No action required.
Consent duration	<b>Strongly supports</b>	a shorter consent duration and review period.	No action required.
Progress Reports	<b>Supports</b>	progress reports on the implementation and effectiveness of this plan every 5 years.	No action required.