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**Subject:** Plan Chgange 7 to the LWRP submission  
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## Cashmere Stream Care Group submission for Plan Change 7 to the LWRP

### Table 1a

**Freshwater outcomes for Canterbury hill fed lower rivers** sediment particle content less than 2mm at 20% is considered too high. We recommend reduction to 10% where the natural bed content is cobble.

### Section 4

**Section 4.3.1 Livestock exclusion from water bodies** Agree... though in some high country farming operations there needs to be a balance struck between grazing and vegetation fire risk and the practicality of fencing waterweays that experience repetitive stormwater damage or where stocking rates have minimal environmental impact

**Section 4.36A Nutrient management** Support limits

**Section 4.61A Abstraction of water** Support

**Section 4.101 and 4.102 Habitat of indiginous Freshwater species** Strongly support

**Section 4.103 Requirement on consent holder to supply monitoring data** Strongly support.

### Section 5

**Forestry** We do not accept that removal of sections **Section 5.72 and 5.73 and 5.74** relating to forestry should be replaced giving consent holders the freedom to use the Forestry ECOP 2007 guidelines which do not properly address the issues of sediment and erosion on highly erodable hill country soils. There needs a total rethink to prevent erosion and sediment control failure in moderate and severe storm events. Plans for harvest on highly erodable soils e.g. loess should require extensive natural indiginous vegetational barriers to sediment migration to be **fully established seperating the harvest area from storm water carrying channels at least 2 years prior to harvest. Planting areas dimensions and densities for barrier agents e.g Carex/flaxes to be defined to ensure effectiveness before consents issued.**

**Section 5 Stormwater 5.96 and 5.97 and 5.98** support max of 50 gm/cubic meter sediment standard

**Section 5.112 Water take on water conservation rivers** . Limited support. Water storage should be mandated to meet normal animal requirements

**Section 5.120 Site dewatering** Support

**Section 5.1 O**

**Section 5.133** Oppose. Water is a National asset. It should be subject to lease terms set by the crown and its use should not be treated as a property right belonging to individuals/ commercial operators.

**Section 5.146A** Support fine sediment removal from Rivers

**Section 5.167 and 5.189 and 5.190)** Need Strengthening.

**.WE WOULD LIKE TO SEE A STRENGTHENING OF EROSION AND SEDIMENT CONTROL MEASURES IN COMMERCIAL FOREST HARVESTING ON STEEP HILL COUNTRY (IN PARTICULAR ON EROSION PRONE SOILS e.g. LOESS) BEYOND THOSE SET DOWN IN THE FORESTRY ECOP 2007**

**Section 5.189** support subject to strengthening above. We note that with regard to outcomes this clause should take precedence over 5.167 which it appears to be in conflict with.

**Section 5.190** It should be " taken as read" that harvest of commercial forests on hill country will become a discretionary activity during periods of moderate to heavy rain events. Owners of forests on highly erodable soils should be required to fully establish substantial buffer zones of natural indigenous cover e.g tussock and flax barriers to capture sediment flow and to set up sediment catch ponds. Planting densities and areas along the contour line separating the harvest area must be deemed to be fully capable of meeting their purpose before permits are to be issued for harvest or other land disturbing activities likely to produce sediment migration risk that would see the sediment standards breached.

**Section 8.4.17 Transfer of water permits** Strongly support

**Section 8.4.18** support

**Section 8.50A** Do not support. Appears to undermine 8.4.17

**Section 8.4.19 Stream augmentation** Strongly support

**Section 8.4.25 Nutrient management** Strongly support