

From: [Sustainable Otagahi Christchurch](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission Sustainable Otagahi Christchurch
Date: Friday, 13 September 2019 4:06:12 PM

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This submission is for an organisation - Sustainable Otagahi Christchurch (SOC).

SOC formed in 2005 from the merger of Sustainable Cities Trust and Christchurch-Otagahi Agenda 21 Forum. Former members of both those groups are involved, along with a new generation of Otagahi-Christchurch people, who work towards the vision of Otagahi-Christchurch people “practising, living and demonstrating sustainability in all that they do.”

- We strongly support the caps on any new water allocation.
- We strongly support the setting of nitrate limits for rivers and groundwater and the policies and rules that restrict any further increase of nutrient discharges.
- We strongly 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.
- We strongly request all minimum flows and associated partial restrictions to provide for the ecological health of the stream, river, hapua (lagoons), etc. within the life of this current plan.

For the Waimakariri section:

We consider the implications 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.

3.8 mg/l is too high a level for ecological health and may be proven to be unsafe for human health also. Chris Hickey (NZ ecotoxicologist) recommends in his evidence to the Te Waikoropupu springs WCO hearing that where long lag times apply, a management limit of 0.55–1.1 mg/l is appropriate. Graham Fenwick (a leading NZ groundwater ecosystem scientist) has suggested trigger value of 0.4–0.5 mg/l as a precautionary value to ensure ecosystem health. We need to heed the expertise of such people and be able to respond to research which comes in on impacts of nitrates on human health. The level should be both precautionary and based on science.

We consider that the implication for future nitrate pollution of Christchurch’s drinking water is inconsistent with Strategic Policies in the Land and Water Regional Plan: 4.4 *Groundwater is managed so that: Overall water quality in aquifers does not decline;* and 4.5 *Water is managed through the setting of limits to safeguard the life-supporting capacity of ecosystems, support customary uses, and provide for community drinking-water supplies and stock water, as a first priority...’.*

We believe that the aquifer ecosystem which provides Christchurch’s drinking water requires specific protection, greater than what is afforded in the current plan’s rules for nitrate reductions. The biota found in our aquifer system are not well known and understood but this is no excuse for endangering the ecosystem with toxic levels of pollutants.

We applaud the efforts of farmers and other land users who are working hard to mitigate the impacts of their activities and encourage Environment Canterbury and others to support them, and others to do the same, so all can share in the benefits of a sustainable environment.

We believe that despite the modelled nitrate pollution being 50+ years away that it is not acceptable for us in 2019 to set up to produce pollution that will have to be paid for and coped with by future generations. This is not the way to secure a sustainable future for our city and its people.

For the Ominbus Section:

We support the rules applying to:

- Greater restrictions on activities to improve protection of the remaining habitat of native freshwater fish;
- Additional stock exclusion provisions for swimming sites,
- Greater recognition of values (such as mahinga kai) and protection of sites of significance to Ngai Tahu, including wahi tapu (sacred sites), wahi taonga (treasured sites), tuhituhi o nehera (limestone rock art sites) and waipuna (springs).

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

Colleen Philip,
Chairperson,
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