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**To:** [Mailroom Mailbox](#)  
**Subject:** submission  
**Date:** Friday, 13 September 2019 4:59:11 PM  
**Attachments:**

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Submission attached

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

By: Rural Advocacy Network

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I/we could not gain an advantage in trade competition through this submission.



13/9/2019

We do wish to be heard in support of our submission & may consider presenting our submission as a joint case with others with a similar submission at any hearing.

### Submission

(1) Planning maps new planning layer 'indigenous freshwater species habitat'.

Our submission is to oppose the inclusion of the indigenous freshwater species habitat planning layer into the LWRP for the following reason:

- i. In the last 8 years Environment Canterbury have developed a habit of mapping areas on private land without any affected landowner consultation and in some cases no proper RMA process. This includes the recent wetlands mapping and draft riverbed lines. This has caused widespread concern among landowners and is one of the main reasons why there has been a huge loss of trust of ECan. As a result this has compromised ECans ability to achieve positive outcomes and is delivering consequences that is contrary to the purpose of the RMA. In relation to the indigenous freshwater species habitat mapping there has not been individual affected landowner consultation. Undertaking

meaningful consultation greatly increases the chances of achieving intended outcomes and is a hallmark of good planning practice.

We seek the following decision from Environment Canterbury: to remove the indigenous freshwater species habitat planning layer from the LWRP planning maps and consequently all other references in PC7 to indigenous freshwater species habitat including rules and policies.

(2) Planning maps new planning layer Mataitai Protection Zone.

Our submission is to oppose the inclusion of the Mataitai Protection Zone planning layer into the LWRP for the following reason:

Mataitai reserves are gazetted under the Fisheries Act for the purpose of customary fishing. Recently new Mataitai reserves in North Canterbury and Kaikoura has caused a huge outcry from affected landowners and legal action is imminent. As part of the ongoing dialogue landowners have been assured by Ministry officials that the Mataitai reserves only relate to the practice of customary fishing and does not affect land use activities. By including land use controls through a regional council plan is highly inappropriate and likely to be counterproductive to maintaining good working relationships with landowners and compromise achieving positive outcomes.

We seek the following decision from Environment Canterbury: to remove the Mataitai Protection Zone planning layer from the LWRP maps and consequently all other references to Mataitai Protection Zones including rules and policies.

Jamie McFadden  
Rural Advocacy Network