

From: [Peter Tuffley](#)
To: [Mailroom Mailbox](#)
Subject: Water Zone Plan Change 2 (Waimakariri) - BNA Submission
Date: Friday, 13 September 2019 4:25:37 PM
Attachments:

Greetings

Please find attached the submission from the Beckenham Neighbourhood Association Incorporated.

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WATER ZONE PLAN CHANGE 2

SUBMISSION BY THE BECKENHAM NEIGHBOURHOOD ASSOCIATION INC.

1 Water quality has been a major concern of the BNA through the almost 40 years of its existence.

2 Concern about rising nitrate levels in the water supplies of Christchurch and other parts of Canterbury has in recent years been voiced publicly on numerous occasions by the Canterbury Medical Officer of Health and been treated dismissively by ECan representatives. Only recently does ECan appear to have begun to take the matter more seriously.

3 As former ECan Chair Sir Kerry Burke has observed, it was predictable (and not only predicted but, as Sir Kerry suggests, perhaps intended), that the zone committees would be captured by vested interests. The proposed plan change appears to us to bear out that prediction.

4 Our issue is specifically with the proposed reductions in nitrogen losses, and our primary concern is with the possibility of nitrates leaching under the Waimakariri River into aquifers that are a source of drinking water for Christchurch, as noted in Christchurch City Council's Integrated Water Strategy.

5 ECan's proposals would result in a proposed maximum nitrate concentration of 3.8mg/l in Christchurch's drinking water, and ECan appears to be touting this as an "improvement" – a claim which appears mysterious to say the least when the current average nitrate level in Christchurch's drinking water is 0.6mg/l.

6 What ECan represents as improvement is setting the maximum too high to serve as effective protection for drinking water. It looks more like a mass poisoner's charter – with no apparent provisions for policing and for penalizing breaches of even the inadequate standards ECan is proposing.

7 An acceptable reduction in our drinking water nitrate level would be a genuine reduction from the current 0.6mg/l towards a target of zero. An increase to 3.8mg/l would be a great health risk and is totally unacceptable.

8 An even more offensive aspect of these proposals in our view is their timing – proposals whose effects will last generations being put in place in the dying days of the term of office of a Council whose democratic legitimacy is at best flawed, and just in time to use expiring provisions under the Environment Canterbury (Transitional Governance Arrangements) Act 2016 under which appeals can only be made on points of law, not on the substantive issues of the environmental impact.

9 We note that ECan has requested the Health Ministry to institute studies on the relationship between nitrates in water and health. One would like to think that this reflects a genuine concern about the matter, and in our view it would be more consistent with such concern if the plan changes were to be put on hold for a few months, instead of being pushed through before a new Regional Council with an actual democratic mandate takes over and before it becomes possible to appeal any decisions on their environmental merits. We therefore ask specifically that ECan receive submissions on this Plan Change but leave final decisions on it to the incoming democratically elected council.

10 If this proposed plan change is put into effect before the expiry of the Environment Canterbury (Transitional Governance Arrangements) Act 2016, we would expect to see public demand for the new democratically elected ECan to revisit it and reopen public consultation with a view to requiring lower nitrate levels than currently proposed.

11 We have noted public complaints from the farming industry – which has enjoyed a licence to profit from and degrade our water for some 10 years – that the so-called nitrate "cuts" are

excessively onerous. We would suggest that, if people cannot afford to conduct their business in a manner that is not publicly harmful, then it is legitimate to question whether they should be in that business at all. When what is at stake is clean safe drinking water for New Zealand's second largest urban population, a clear precautionary approach should be applied.

12 We wish to be heard in relation to this submission.

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