

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

By **English, R**

Submitter Identification number: **PC7-506**

Wishes to be heard: **No**

Would consider making a joint submission at the hearing: **No**

Submitted on: **07/09/2019**

This submission was submitted via Environment Canterbury's online submission portal. The Submissions portal generates pdf files of submissions (as attached). However, some of the information that appears in the pdf files is not consistent with information the submitter entered into the portal, specifically, where submitters have ticked:

- "I wish to be heard in support of my submission" ; and
- "If others make a similar submission I will consider presenting a joint case with them at a hearing".

Additionally, the submissions portal has generated submitter and submission point numbers that are not consistent with the numbering applied in the Summary of Decisions Requested. Submission points in the Summary of Decisions Requested (SODR) are numbered using the following format:

PC7 – Submitter ID #.Submission point #

The correct submitter identification number and submitter information is specified above. This will be the number referred to in the SODR.

Proposed Plan Change 7 to the Land and Water Regional Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando
Date received 7/09/2019 1:46:38 PM
Submission #24

Address for service:

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Wishes to be heard? No
Is willing to present a joint case? No

Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).

- Could you gain an advantage in trade competition in making this submission?
- No
- Are you directly affected by an effect of the subject matter of the submission that
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition
- No

Submission points

Point 24.1

Submission

Schedule 8 Region-wide Water Quality Limits - Groundwater (page 201)

Whilst I congratulate Environment Canterbury on the overall thrust of PC7 it does have one glaring error. There is no consideration given to the potentially critical place of aquifer stygofauna in the maintenance of aquifer and hence fresh water health in the region. Whilst the toxicology of fresh water flora and fauna is well documented toxicology in relation to stygofauna is uncertain.

A significant amount of debate surrounded the latter topic at last year's Water Conservation Order hearings for the Waikoropupu Springs in Golden Bay. The current draft of the Order specifies that in order to protect the aquifer stygofauna nitrate nitrogen levels should not exceed 0.55 mg/l (i.e. **twenty** times lower than the limit proposed in PC 7) Which level is correct? 0.55 mg/l or 11.3 mg/l or somewhere in between perhaps.? As I noted above nobody knows. However should ECan adopt its currently proposed level and it is later proven that a lower limit is required to protect the stygofauna it may be too late to rectify the situation.

Accordingly I urge ECan to place PC7, laudable as it is, on hold until the appropriate research has been undertaken.

Relief sought

Groundwater Nitrate Nitrogen limit section to be placed on hold until relevant research is conducted. In the alternative Maximum and Annual Average limits to be reduced to 0.55mg/l

Section: Schedule 8 Region-wide Water Quality Limits

Sub-section: Schedule 8 Region-wide Water Quality Limits

Provision

General