

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

By **Foster, R**

Submitter Identification number: **PC7-513**

Wishes to be heard: **No**

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

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

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 9/09/2019 2:34:18 AM  
Submission #32

### 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

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### Point 32.1

#### Submission

I oppose this plan change for the following reasons: As both an environmentalist and a sports angler I have an interest in both sides of this controversy, and try to appreciate the natural aspects as well as human considerations. The facts in evidence are clear. Despite a century or so of rampant salmonid domination of countless waterways, there remains a residual population of indigenous fresh water species (fish in particular) which are not threatened so require no special interventions.

Primary habitat for indigenous fish is small head water streams, which salmonids use only for spawning-feeding there is clearly a threat to local fish but is only incidental. A young salmonid will shift downstream as quickly as possible, posing no real threat to indigenous fish. The real threats are (1) native eels (which specifically feed where native fish take shelter, (as is the way of nature) (2) natural habitat disasters notably destructive flooding, and (3) loss of habitat due to human diversion for economic gain. The best solution for augmentation of native species thus would be to remove or limit humans, not salmonids! The natural selection caused by salmonids serves to strengthen the genetic adaptability of native species, as is clearly shown by modern studies of the role of predators in all ecosystems.

I am also alarmed by the ambiguous language of PC7 and would return it for this reason alone. It seems to refer mainly to salmonids but is vague. What is the actual problem addressed? What is the fish passage referred to-and is it upstream or downstream?. (There is a difference!) Because human activity is a critical component to this matter, due regard must be given to current human culture and values as are expressed in law by several management Acts including water conservation orders. Local councils should not assume the right to change fundamental human activity. This must be done by a popular vote in any democracy.

Furthermore, it is likely that efforts to enhance salmonids actually benefit native species as well, because habitat is always the limiting population driver. Structures that limit habitat in any way might initially indicate an advantage to certain species but in the long run this turns out to be an illusion.

California has a number of examples trying to control movement (both pro and con) of fish species. The results are not encouraging but are always expensive and unpredictable and usually fruitless. Also, it is often unclear just what turns out to be a "pest or nuisance". Fish species (all are "invasive" in a new environment) but the indigenous population always survives (even insects and amphibians) in some fashion although limited.

In-stream structures, as a means to control nature, need to be mindful of the currently recognized "new nature" which accepts

humanity as part of the overall equilibrium and inevitably at the expense (but not demise) of the existing natural world. If species enhancement is deemed necessary, there may well be better success with more focused approaches already used for endangered species.

Dr. Robert Foster

**Relief sought**

The plan as proposed is unacceptable in its entirety. It needs to be returned to be rewritten. Please see my previous statements for specifics. Concepts are flawed. Definitions are imprecise. My rationale as stated in the previous section should be considered in the re write.

**Section:** Section 4 Policies

**Sub-section:** Section 4 Policies

**Provision**

**Habitat of Indigenous Freshwater Species**