

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

By **Chambers, J**

Submitter Identification number: **PC7-519**

Wishes to be heard: **No**

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

Submitted on: **08/09/2019**

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 8/09/2019 5:09:00 PM
Submission #37

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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
 - Yes

Submission points

Point 37.1

Submission

The plan does not limit nitrate levels enough to ensure the drinking water in ChCh and the Canterbury region is safe for people to consume. Nor does it ensure the safety of fresh water ecosystems. As the regulatory body tasked with the protection of our environment the restrictions you have put forward for nitrates in the plan change don't go far enough to ensure environmental protection. By allowing nitrate levels to increase by this much it also implicitly allows the associated environmentally damaging practices that result in increased nitrate levels. It is becoming clearer and clearer that intensive irrigation and farming on parts of the Canterbury plains is significantly damaging the environment and is an inappropriate use of this land. It will be your names who are called out when in the coming years and decades we see the deleterious effects of the weak regulation you have presided over. However, if you take a much stronger position on nitrate level reduction, it could also be your names who are heralded as those who genuinely put environmental safety ahead of economic gains by inappropriate land use.

To further elucidate my thoughts I attach below the points raised by ChCh City councillor Vicki Buck which I am in support of:

The Christchurch aquifers which provide an old and pure source water for Christchurch residents are highly valued by the people of Christchurch. Some time in the last decade we have learned that nitrates from the Waimakariri area leach under the Waimakariri river and into those pure aquifers and that the land use currently allowed in those places is allowing nitrates to leach.

Ecan is aware of this and as they say on their own website "Environment Canterbury's role is to... protect it at its source"

However what this plan change does, in the guise of pretending to lower nitrate levels into the Christchurch aquifers is allow for decades of increases. It does too little, far too slowly.

The current average for the deeper wells from which we extract water is around 0.477mg/l and the proposed increase in the Christchurch area is a target of 3.8mg/l on average. That is a massive increase in nitrate levels!! And one that I'm certainly not prepared to tolerate and I suspect that unwillingness to tolerate this is true for most people in Christchurch. Worse, as I read this, this is only the average and the level could be substantially higher. Worse again, I find no penalties for going above this, so as I read it the effective allowable level could be in some areas at some times the drinking water maximum of 11.3 mg/l.

To go from a very rare pure water source that is old water to allow such a massive increase in nitrates is in my view not "protecting our water at its source" Quite the opposite. It is in my view environmental vandalism in the extreme.

As I read it the allowable average for the Waimakariri area is even worse at 5.65mg/l. So the people in our neighbouring district pay an even higher price. Given that this is again an average, and again there is no mention of penalties this is even more scary for the people of Waimakariri.

Interestingly in their notification to Christchurch residents of this scheme the pamphlet delivered to letter boxes starts "Calling all Canterbury residents- particularly if you live in South Canterbury or Waimakariri" almost as though it wants to deter those in Christchurch from reading it. However, even when they do there is no mention of the damage to the Christchurch drinking water aquifers and the huge increase in nitrate.

The ZIPA itself says (p25) "Any increase in nitrates is likely to be below the maximum acceptable value defined in the NZ Drinking Water Standards" Thats it! It almost feels as though Ecan didn't want to actually be frank about the massive increase in nitrates that they are allowing. I know Ecan says that the nitrates are "in the post" and they portray their actions as taking action on them. The action is slow and tortuous and completely insufficient and will not protect the aquifers fast enough.

There is no mention of the cost of any attempt to remedy that to Christchurch residents either individually or as a community through its Council . This is an absolute breach in my view of the responsibility of Ecan to explain what it is doing so that public input is informed and rationale. I would add here how complex the explanation is on their website and with no "two pager " explaining to Christchurch people what the impact of this plan change is on them , one could get the impression they really dont want to hear from Christchurch people.

In this case the external costs of certain types of production in some areas of the Waimakariri District are made exempt for the farmers and externalised to the city and the community living nearby . There is no real mention , except in a footnote of a guesstimate of the cost of remediation. But some estimates have put that as high as \$1000- \$2000 per annum per household in the Christchurch area . Thats absolutely massive and way too high a price to pay for a lack of action on nitrates from the very body charged with protecting our water at its source .

Certainly there are no Christchurch representatives on the working group that did the Zone Implementation Programme Addendum . The introduction talks of local residents only and a councillor from Waimakariri, and Ecan but not the Christchurch City Council . I note some representatives are farmers who would normally be judged as conflicted in most issues of local government. Christchurch City Council views, when it was finally allowed to give a view, have been completely dismissed by Ecan. And yet that is nearly 400,000 people who are vitally impacted.

It is vital that Christchurch aquifers continue to have a low level of nitrates. I understand from the City Council's submission that there is major damage to the ecosystem and stygofauna above 0.44mg/l and there is a comprehensive Danish study which links nitrate levels above 0.87mg/l with an increase in colorectal cancers . The health impacts of these massive increases in nitrates have not been considered in the report, either on the ecosystem or on human health and yet Ecan considered the Danish report robust enough to ask the Ministry of Health to do further research on this . I would expect the water source protector to take a precautionary approach on this

Ecan has only modelled the nitrate management targets based on the 50th percentile and not the more precautionary 95th percentile . Again this is high risk and the risk sits with the potential total destruction of the deep drinking aquifers by nitrates . The remedy sought is the same in all cases ...a much faster , and much lower target for action on the nitrate nitrogen incursion . The current proposal is way too slow and the damage way too great and the reductions way too small

Intriguingly I can't find anywhere that models the impact of climate change on this and yet over the next decades that impact could be dramatic

Its difficult as a resident of Christchurch , with no vested interested in any agricultural property in the Waimakariri district that the huge impact, cost in terms of health of ecosystems and people and the massive economic costs of repair seems to have been deliberately underplayed by Ecan in order to preserve for longer the ability of farmers to destroy the Christchurch aquifers and to externalise those costs . As I understand it this can be done quite rapidly by improved farming practices, and should be done quickly , and the reduction should be major. Water is the most precious taonga we have and Christchurch has a very rare and pure system . To allow it to be wantonly polluted is outrageous.

As a final insult to the people of Christchurch Ecan has done this plan change under legislation which means that we cannot appeal to the Environment Court on the merits of the case . Use of that Act is horrific in this instance when our very drinking water, the health of the aquifers, and the health of the population is at stake , not to mention the hugely high cost this continuing practice imposes on all residents in Christchurch .

Relief sought

See previous text.

Section: General

Sub-section: General

Provision

General