

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

By **Gunn, K**

Submitter Identification number: **PC7-531**

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 9:24:45 PM  
Submission #54

### Address for service:

Gunn Keith / 54  
58 Carters Road Allenton Ashburton  
Mobile: 0210626137  
Email: keithgunn@xtra.co.nz  
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

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### Point 54.1

#### Submission

I oppose PC7 policy 4.102 for the following reasons:

There is no definition what fish species is considered invasive or pest species but if it were to include either salmon and or trout the policy has the potential to adversely affect the sports fishery. Both these fisheries are significant nationally and internationally and extremely important to many people.

Our salmon fishery has declined to a shadow of what it was and to potentially reduce spawning areas could be devastating to that stressed fishery.

Historically sports fish and indigenous species have coexisted and the decline in abundance of all these species is due, not to the predation by a dominant species, but the lost of water from swamps, creeks, rivers and lakes and the pollution in those water bodies, temperature increases in the water, river mouths being closed to migrating species, ineffective fish screens (or absence thereof) at irrigation intakes and a multitude of other habitat derogation.

What has caused the decline of sports fish has also caused the decline in indigenous fish an it would be wrong to put more pressure on sports fish - by potentially reducing some of their spawning sites - when they are not the cause of the decline in indigenous fish numbers.

Water Conservation Orders on the Rakaia River and Rangitata River protect the outstanding fisheries in those rivers.

Fish and Game Councils have been tasked to manage sports fish and game under the Conservation Act and ECan should not write policy that impacts the regulated authority of those councils.

#### Relief sought

Delete ALL of PC7 policy 4.102

4.102

Structures enable the safe passage of indigenous fish, while avoiding as far as practicable, the passage of any invasive, pest or nuisance fish species by:

1. the appropriate design, construction, installation and maintenance of new in-stream structures; and
2. the modification, reconstruction or removed of existing in-stream structures.

**Section:** Section 4 Policies

**Sub-section:** Section 4 Policies

**Provision**

4.102

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- b. the modification, reconstruction or removed of existing in-stream structures.