

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

By Orari River Protection Group

Submitter Identification number: **PC7-551**

Wishes to be heard: **Yes**

Would consider making a joint submission at the hearing: **Yes**

Submitted on: **12/09/2019**

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 12/09/2019 1:47:36 PM
Submission #80

Address for service:

Orari River Protection Group - Adele Coombs / 80
243 Talbot St Geraldine 7930
Phone: 036939041
Mobile: 02102369674
Email: adelecoombs@y7mail.com
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 80.1

Submission

Part A:

We support the Plan to prevent incremental loss of habitats of indigenous freshwater species, especially to map and protect habitats of 11 threatened indigenous fish & invertebrates. We note that the Orari river is home to the rare Blue Gilled Bully, Canterbury Galaxid, Tuna, and upland Bullies. The Orari river needs to be included in the mapping of habitats of these threatened indigenous fish.

Relief sought

The Orari river is home to the rare Blue-Gilled Bully, Canterbury Galaxid, Tuna, and upland Bullies. **The Orari river needs to be included in the mapping of habitats of these threatened indigenous fish.**

Section: General

Sub-section: General

Provision

General

Point 80.2

Submission

Environment Canterbury needs to review consents on the Orari river immediately, and move into the second and third steps to introduce a higher minimum flow and a reduction in over-allocation. The planned target date for reviewing consents of 2023 is not soon enough for the protection of wildlife on the river as well as Geraldine's drinking water supply. Further delays in taking these steps will only serve to impact the wildlife on the river and the water quality in the river & Orari aquifers.

The Integrated Catchment Management Plan (ICMP 2008) for the Orari River developed by ECan with extensive community

consultation needs to be included in the Land & Water Regional Plan, with its strategies implemented as soon as possible. This ICMP needs to be incorporated into this Zone planning, until such time as the Orari River ICMP is reviewed. There is no reason for it to be deleted from the Planning documents, as the only thing wrong with this ICMP is that it hasn't yet been implemented!

Relief sought

Section 14 OTOP Zone Committee

We do not support the deletion of this statement in Plan Change 7:

~~The Orari-Opihi-Pareora Zone Committee has identified a suite of recommendations covering ecological, cultural and economic outcomes for the Zone. The Orari Integrated Catchment Management (ICM) Group has prepared a Catchment Management Strategy and the review of environmental flows is identified as an action point.~~

We wish to also include this statement in the Land & Water Regional Plan:

The Integrated Catchment Management Plan (ICMP 2008) for the Orari River developed by ECan with extensive community consultation needs to be included in the Land & Water Regional Plan, with its strategies implemented as soon as possible. This ICMP needs to be incorporated into this Zone planning, until such time as the Orari River ICMP is reviewed.

There is no reason for the ICMP to be deleted from the Planning documents, as the only thing wrong with this plan is that it hasn't yet been implemented!

Section: Section 14 Orari-Opihi-Pareora

Sub-section: Orari-Temuka-Opihi-Pareora Zone Committee

Provision

In 2012 the Orari-Temuka-Opihi-Pareora Zone Committee developed a Zone Implementation Programme (ZIP) under the Canterbury Water Management Strategy. The ZIP is a non-statutory document that includes recommendations for actions, and proposals to implement the Canterbury Water Management Strategy within the Orari-Temuka-Opihi-Pareora sub-region.

The vision in the Orari-Temuka-Opihi-Pareora ZIP is:

'Water is precious and limited. It must be managed in ways that recognise and balance its importance for cultural, economic and recreational use, aesthetic and landscape values and biodiversity values and delivers both individual and community good. We affirm and recognise tangata whenua and the value they place on mahinga kai, and the priority of available high quality sources of drinking water in rivers, waterways and aquifers. We also recognise the intrinsic value of aquatic ecosystems and river health (quality and flow), and the need to both prevent further decline and then restore wetlands and waterways. We know that to achieve all the targets of the CWMS within our zone it is necessary to find a way to bring more water into the zone.'

~~The Orari-Opihi-Pareora Zone Committee has identified a suite of recommendations covering ecological, cultural and economic outcomes for the Zone. The Orari Integrated Catchment Management (ICM) Group has prepared a Catchment Management Strategy and the review of environmental flows is identified as an action point.~~

~~In the Orari catchment a three-stepped approach to managing flow and allocation in the catchment was developed by the Orari Environmental Flow and Allocation Regime Steering Committee to assist with achieving the Zone vision and the objectives to this Plan. The first step caps current allocation. The next step is introduced three years after the LWRP becomes operative and the final step is a vision for 2040.~~

~~The steps involve a combination of increasing environmental flows and reducing allocation limits for the Orari catchment so that in-stream ecological, cultural and economic values are better met. The limits are to be achieved through managing transfers of water permits, storage, metering, reasonable use, water user groups, augmentation and efficiency. Alongside the policies and rules in this Plan, there is also an accord between the Orari Environmental Flow and Allocation Regime Steering Committee and the Zone Committee to implement other actions to achieve the vision for the catchment. The 2040 environmental flow and allocation regime is a vision that may change along with new scientific information. Actions include a collaborative approach to improving water quality through fencing and planting waterways and investigating other practical on the ground solutions to achieve outcomes. There is also a need for increased certainty surrounding the science within the Orari catchment.~~

~~Within the Orari environmental flow and allocation regime, two maps along with definitions of each minimum flow site and the different zones are provided at the back of this section. A background to each of the sites is provided below.~~

~~Orari mainstem permits are attached to the Upstream Ohapi minimum flow site and allocation limit. The Orari mainstem contains the mainstem conjunctive use zone and the Coopers Creek conjunctive use zone. Given the lack of hydrological data and scientific understanding with the upper section of Coopers Creek and the Upstream Ohapi, mainstem minimum flow will apply to users within this catchment.~~

For Ohapi Creek, the existing minimum flows and flow-sharing regimes, including a Water Users' Group within this catchment, have worked well historically and the ecological situation is considered to be supported under this regime. Therefore the status quo is to remain in place in this Plan, with the addition of a conjunctive use zone.

Given the lack of hydrological data available for Rhodes Stream, the minimum flow and allocation regime is proposed to remain unchanged until a more complete hydrological understanding is obtained. Therefore the status quo is to remain in place in this Plan with the addition of a conjunctive use zone.

In addition to the Orari-Temuka-Opihi-Pareora Zone Implementation Programme (ZIP), the Orari-Temuka-Opihi-Pareora Zone Committee have developed, in conjunction with community and catchment groups, an Addendum to the ZIP (ZIPA). The ZIPA contains recommendations to protect and enhance freshwater resources, cultural values and biodiversity in the Zone, and is intended to be delivered through statutory provisions, and non-statutory actions. The ZIPA aims to maintain or improve the quality of freshwater and phase out and prevent the recurrence of over-allocation of freshwater resources. Key actions to implement the recommendations in the ZIPA include:

- The establishment of six Freshwater Management Units to represent major surface water catchments and groundwater resources within the Orari-Temuka-Opihi-Pareora sub region (being the Orari, Temuka, Opihi, Timaru, Pareora and Groundwater FMUs);
- The establishment of environmental flow and allocation regimes on the North and South Opuha, Upper Opihi and Te Ana Wai rivers, which include increased minimum flows and capped allocation limits;
- The establishment of an alternative management regime for the Opihi mainstem with alternative minimum flow levels which respond to drying climatic conditions;
- Within the Temuka FMU, an increase in the minimum flow, reduction in the allocation limit, setting of pro-rata partial restrictions, and the reservation of water for mahinga kai purposes;
- The establishment of High Nitrogen Concentration Areas and requirements for farmers in HNCAs to further reduce nitrogen losses over time;
- Nitrogen limits for higher-risk farms, and requirements for farmers to operate at Good Management Practice and prepare and implement audited Farm Environment Plans.

Point 80.3

Submission

We support extending the Groundwater Allocation Zone Boundaries to include the entire sub-region, as the Orari River is impacted by high nitrate hot-spots in the Rangitata-Orton area as well as areas nearer to Fairlie in the upper reaches of the Orari gorge.

Environment Canterbury needs to review consents on the Orari river immediately, and move into the second and third steps to introduce a higher minimum flow and a reduction in over-allocation. The planned target date for reviewing consents of 2023 is not soon enough for the protection of wildlife on the river as well as Geraldine's drinking water supply. Further delays in taking these steps will only serve to impact the wildlife on the river and the water quality in the river & Orari aquifers.

Relief sought

Section 14.4

Table 15

Section: Section 14 Orari-Opihi-Pareora

Sub-section: 14.4 Policies

Provision

Orari Freshwater Management Unit

Point 80.4

Submission

The recognition of the Orari gorge as an area of "High Naturalness" needs to be included in the Land & Water Regional Plan, along with both maps of the Orari River catchment and a clear statement of how this will protect the catchment area in the upper Orari to keep the water quality pure. It's very important to restrict any further intensification (including irrigation and forestry) in the upper Orari catchment to keep the water in the gorge in its natural state. This has a direct impact on Geraldine's drinking water supply intake as well as biodiversity in the upper river catchment. The Orari is already over-allocated, and any further irrigation, intensification or forestry in the upper Orari catchment would also affect the water yield in the Orari. This which would impact on

land-holders downstream as well as ecological flows for bio-diversity in the Orari river.

Relief sought

Section 14.8

and Section 4.6

In high naturalness water bodies listed in Sections 6 to 15, the damming, diverting or taking of water is limited to that for individual or community stock or drinking-water and water for the operation and maintenance of existing infrastructure.

This also needs to include a policy about preventing further intensification (by irrigation or forestry) to protect any further deterioration of water quality in high naturalness water bodies.

Section: Section 14 Orari-Opihi-Pareora

Sub-section: 14.8 High Naturalness Water Bodies

Provision

PC7 Instruction Note: delete Map 1 Orari Catchment and Map 2 Orari Catchment.

Point 80.5

Submission

We support extending the Groundwater Allocation Zone Boundaries to include the entire sub-region, as the Orari River is impacted by high nitrate hot-spots in the Rangitata-Orton area as well as areas nearer to Fairlie in the upper reaches of the Orari gorge, which has been recognised as an “Area of High Naturalness” and needs to be protected across the whole catchment.

We seek a stop to further intensification in farming or forestry along the upper Orari in the McKenzie district, to protect the upper Orari River natural tussock land. This tussock land has high value for its biodiversity and sequestration of water which protects the flow in the Orari River.

Relief sought

Section 14 Groundwater zones

We seek a stop to further intensification in farming or forestry along the upper Orari in the McKenzie district, to protect the upper Orari River natural tussock land.

Section: Section 14 Orari-Opihi-Pareora

Sub-section: Groundwater Freshwater Management Unit

Provision

General

Point 80.6

Submission

We support the tightening of water quality targets for high nitrate zones, but we seek this much sooner than is in the current Plan.

We seek water quality targets that reduce nitrate levels much sooner than is currently planned across the whole Orari catchment, including the Rangitata-Orton hot-spot and the Fairlie basin in order to reduce nitrates reaching the Orari River. We are aware that there has been irrigation equipment installed with plans to irrigate in the upper Orari catchment above the gorge, and any consents for this need to be stopped to protect the water quality in the Orari gorge.

We insist that the OTOP Zone needs to tighten its water quality standards for nitrogen limits to comply with improvements for national standards for drinking water and groundwater that are “in the pipeline” now from central Government. There needs to be reductions in total cow numbers with limits to protect the water and restore the lower reaches of the Orari to better health from the downstream degradation. Excess nutrients mean that phormidium is present even during high flow times and the lower reaches of the Orari are un-swimmable in summer. Nitrate levels in wells in the lower Orari catchment have been tested at 20mg/litre and

above (Zarour & associates, 2016). This is nearly twice the level of nitrates allowed under the World Health Organisation limit of 11.3. The target time-frames need to be much sooner to allow the Orari and other rivers and aquifers in the OTOP zone to recover safe nitrate levels. Reducing nitrate levels by only 10% in eleven years is far too long a time-frame for the health of the water in the OTOP zone rivers & aquifers! A much better target would be to reduce nitrate-limits by 10% in 3-5 years.

Relief sought

Section 14 - General

The targets for reduction of nitrates in high nitrogen concentration areas need to be sooner than five years after 2023.

Section: Section 14 Orari-Opihi-Pareora

Sub-section: High Nitrogen Concentration Areas

Provision

General

Point 80.7

Submission

We do not support the change to stock exclusion from freshwater bathing areas. The Orari river has several common swimming sites, one on the north bank of the river gorge accessed from North Boundary Road. Several further sites are accessed from Tripp Settlement Road through the Orari Gorge Station. There is a significant swimming site at the Andrews Stream confluence which is not fenced from stock, and this site needs to be fenced upstream of the swimming site also, as we have observed stock wandering downstream in the river from stations along the gorge toward the swimming areas in the Orari gorge. We want ECan to exclude stock from swimming areas in the Orari gorge and other rivers in Canterbury to protect water quality for swimming & recreation.

<u>Orari River at Orari Gorge</u>	J37:653-951 <u>1454820 mE, 5134629 mN</u>	4,000
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Relief sought

Schedule 6:

We want ECan to exclude stock from swimming areas in the Orari gorge and other rivers in Canterbury to protect water quality for swimming & recreation.

We seek all the swimming sites in the Orari gorge and below the gorge to be included in the list of public recreation & bathing sites in the Land & Water Regional Plan.

The following deletions should not be deleted:

<u>Orari River at Orari Gorge</u>	J37:653-951 <u>1454820 mE, 5134629 mN</u>	4,000
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Section: Schedule 6 Areas on Rivers or Lakes Commonly used

Sub-section: Schedule 6 Areas on rivers or lakes commonly used

Provision

			The distance upstream
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Area	River or lake site	Map reference of site (NZTM2000)	from the site where stock are excluded from the river or lake. (metres)
North Canterbury	<u>Irongate Stream at SH1</u>	<u>1663752 mE, 5319096 mN</u>	
	<u>Hapuku River at intake</u>	<u>1657275 mE, 5315825 mN</u>	
	<u>Upper Kowhai River at Kowhai Ford Rd</u>	<u>1651030 mE, 5307003 mN</u>	
	<u>Lower Kowhai River at SH1</u>	<u>1652069 mE, 5303873 mN</u>	
	<u>Lyell Creek Lagoon</u>	<u>1656307 mE, 5305144 mN</u>	
	<u>Charwell River at Inland Kaikoura Rd</u>	<u>1629886 mE, 5303395 mN</u>	
	<u>Kahutara River at SH1 Lagoon</u>	<u>1648429 mE, 5301784 mN</u>	
	<u>Oaro River at Oaro</u>	<u>1641492 mE, 5293039 mN</u>	
	<u>Lewis River at Boyle Lodge</u>	<u>1548908 mE, 5292625 mN</u>	
	<u>Hanmer River below Hanmer Springs Road bridge</u>	<u>1582580 mE, 5286064 mN</u>	
	<u>Mason River adjacent to campground</u>	<u>1603183 mE, 5278005 mN</u>	
	<u>Waiau River upstream of Hanmer River confluence</u>	<u>1582093, mE 5285779 mN</u>	
	<u>Waiau River at Waiau</u>	<u>1602857 mE 5277566 mN</u> N33:179-121	
	<u>Hurunui River-- at SH1</u>	<u>1608328 mE, 5250305 mN</u> N33:909-150	1,000
	<u>Hurunui River-- at SH7</u>	<u>1580947 mE, 5253515 mN</u>	1,000
	<u>Hurunui River adjacent to bach settlement</u>	<u>1622468 mE, 5249063 mN</u> N34:901-929	
	<u>Waipara River-- at Boys Brigade Camp</u>	<u>1579297 mE, 5231467 mN</u>	1,000
	<u>Cave Stream at campground</u>	<u>1496843 mE, 5221602 mN</u>	
	<u>Cave Stream at Cave</u>	<u>1497861 mE, 5216766 mN</u> L34:473-752	
	<u>Ashley Gorge Picnic Ground</u>	<u>1537355 mE, 5213581 mN</u>	1,000
	<u>Ashley River above Rangiora-Loburn bridge</u>	<u>1564891 mE, 5207477 mN</u>	
	<u>Ashley River at SH1</u>	<u>1574717 mE, 5208250 mN</u>	
	<u>Lake Lyndon</u>	<u>1494546 mE, 5204791 mN</u>	
	<u>Pegasus Lake at Motu Quay Jetty</u>	<u>1575339 mE, 5204681 mN</u>	
	<u>Cam River at Bramleys Road</u>	<u>1570570 mE, 5200985 mN</u>	
	<u>Kaiapoi River at Kaiapoi township</u>	<u>1572328 mE, 5196530 mN</u>	
	<u>Waimakariri River at Gorge bridge</u>	<u>1523049 mE, 5198806 mN</u>	
	<u>Waimakariri River at Thompsons Road (the Willows)</u>	<u>1545508 mE, 5187383 mN</u>	
	<u>Waimakariri River at Rock Spur</u>	<u>1566811 mE, 5191046 mN</u>	
	<u>Waimakariri River between SH1 and old bridge</u>	<u>1571600 mE, 5193123 mN</u>	
	<u>Otukaikino Creek at swimming hole</u>	<u>1571299 mE, 5192832 mN</u>	
	<u>Lake Rotokohatu</u>	<u>1565481 mE, 5187454 mN</u>	
	<u>Selwyn River at Whitecliffs</u>	<u>1510439 mE, 5187341 mN</u> L35:242-463	
	<u>Selwyn River -- at Glentunnel</u>	<u>1513817 mE, 5184593 mN</u> M36:596-242	1,000
	<u>Selwyn River - at Chamberlains Ford</u>	<u>1549418 mE, 5162592 mN</u> M36:627-234	1,000
	<u>Selwyn River -- at Coes Ford</u>	<u>1552802 mE, 5161726 mN</u>	1,000

Selwyn River -- at Upper Huts	<u>M36:648-215</u>	4,000
	1554816 mE, 5159753 mN	
<u>Lake Ellesmere/Te Waihora at Lakeside</u>	1549447 mE, 5150492 mN	
<u>Rakaia River at Gorge</u>	1491485 mE, 5180812 mN	

<u>Rakaia River at north end of Lagoon</u>	<u>1539017 mE, 5140150 mN</u>
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Mid Canterbury	Lake Clearwater <u>west of huts</u>	J36:525-315 1442211 mE, 5169870 mN	4,000
	Lake Camp <u>main swimming beach</u>	J36:526-310 1442451 mE, 5169380 mN	2,000
	Ashburton River/Hakatere-- <u>at SH1</u>	K37:987-990 1498726 mE, 5137403 mN	4,000
	<u>Lake Hood at Bayliss Beach</u>	1501838 mE, 5131539 mN	
	<u>Lake Hood at main swimming beach</u>	1500748 mE, 5130716 mN	
	<u>Rangitata River at Peel Forest campground</u>	1461180 mE, 5138854 mN	
South Canterbury	<u>Orari River at Orari Gorge</u>	J37:653-951 1454820 mE, 5134629 mN	4,000
	<u>Lake Opuha at Ewarts Corner boat ramp</u>	1428803 mE, 5128410 mN	
	<u>Lake Opuha at Recreation Reserve</u>	1429002 mE, 5125325 mN	
	<u>Waihi River at Waihi Gorge</u>	1452115 mE, 5126224 mN	
	<u>Waihi River at Wilson St footbridge</u>	1459501 mE, 5116535 mN	
	<u>Hae Hae Te Moana River at Gorge</u>	1446617 mE, 5121702 mN	
	<u>Temuka River at SH1 Bridge</u>	1462349 mE, 5098501 mN	
	<u>Opihi River at Allandale Bridge</u>	1426634 mE, 5115129 mN	
	<u>Opihi River at Raincliff Scout Camp</u>	1439324 mE, 5106886 mN	
	<u>Opihi River at Saleyards Bridge</u>	1451720 mE, 5098611 mN	
	<u>Opihi River at SH1 Bridge</u>	1461885 mE, 5097452 mN	
	<u>Opihi River at Waipopo huts</u>	1466368 mE, 5096791 mN	
	<u>Te Ana Wai River at Belmont Bridge</u>	1436879 mE, 5092043 mN	
	<u>Pareora River at Lindisfarne</u>	1428733 mE, 5088661 mN	
	<u>Pareora River-- at Evans Crossing</u>	J39:540-437 1444034 mE, 5082031 mN	4,000
	<u>Pareora River-- at Brasells Bridge</u>	J39:618-371 1451835 mE, 5075469 mN	4,000
	<u>Pareora River--Pareora at Huts</u>	J39:552-422 1445304 mE, 5080569 mN	4,000
	<u>Otaio River at Otaio Gorge</u>	J39:454-296 1435458 mE, 5067966 mN	4,000
	<u>Waihao River at Black Hole</u>	J40:479-995 1438445 mE, 5037832 mN	4,000
	<u>Waihao River at Gum Tree Road (Dons Hole)</u>	1443824 mE, 5038032 mN	

	J40:643-015	
Waihao— <u>River at Bradshaws Pools</u>	<u>1454090 mE, 5040400 mN</u>	4,000

	<u>1395022 mE, 5128346 mN</u>	
<u>Lake Alexandrina at bottom huts</u>	<u>1396597 mE, 5125237 mN</u>	
<u>Lake Tekapo at Camp Beach</u>	<u>1399399 mE, 5124575 mN</u>	
<u>Lake Tekapo at Lillybank Road Beach</u>	<u>1370054 mE, 5102273 mN</u>	
<u>Lake Wardell</u>	<u>1368259 mE, 5101180 mN</u>	
<u>Lake Poaka</u>	<u>1364728 mE, 5099491 mN</u>	
<u>Loch Cameron</u>	<u>1368788 mE, 5096088 mN</u>	
<u>Twizel River at picnic area</u>	H38:743-552	
Lake Ruataniwha— <u>at Camping Ground</u>	<u>1366191 mE, 5093619 mN</u>	4,000
<u>Lake Middleton</u>	<u>1348609 mE, 5092818 mN</u>	
<u>Pond at Old Iron Bridge Road</u>	<u>1367794 mE, 5092249 mN</u>	
<u>Upper Ohau River</u>	<u>1356756 mE, 5091947 mN</u>	
<u>Wairepo Arm</u>	<u>1366720 mE, 5090733 mN</u>	
<u>Kellands Pond</u>	<u>1365981 mE, 5090705 mN</u>	
<u>Omarama Stream at Omarama</u>	<u>1358382 mE, 5069524 mN</u>	
Hakataramea River at the <u>hotel SH8 bridge</u>	H40:112-064 <u>1401259 mE, 5044411 mN</u>	4,000
Lake Benmore— <u>at Ohau C camping ground</u>	H38:772-543 <u>1376350 mE, 5085541 mN</u>	4,000
Lake Benmore— <u>at Haldon</u>	H39:888-475 <u>1378843 mE, 5085854 mN</u>	4,000
Lake Benmore— <u>at Falstone</u>	H39:870-419 <u>1377045 mE, 5080251 mN</u>	4,000
Lake Benmore— <u>at Glenburn</u>	H39:759-276 <u>1365949 mE, 5065940 mN</u>	4,000
<u>Lake Benmore at Pumpkin Bay</u>	<u>1367185 mE, 5064766 mN</u>	
Lake Benmore— <u>at Sailors Cutting</u>	H39:788-250	4,000

Waitaki catchment

	<u>1368493 mE, 5063512 mN</u>	
	H39:862-228	
Lake Aviemore— <u>at Loch Laird</u>	<u>1376237 mE, 5060738 mN</u>	1,000
	H40:933-187	
Lake Aviemore— <u>at Te Akatarawa Camp</u>	<u>1384179 mE, 5057651 mN</u>	1,000
	H40:959-192	
Lake Aviemore— <u>at Waitangi</u>	<u>1385954 mE, 5057611 mN</u>	1,000
<u>Lake Waitaki at Fishermans Bend</u>	<u>1390823 mE, 5050698 mN</u>	

Point 80.8

Submission

We believe there is an urgent need to go beyond Good Management Practice (GMP) to stop any further nutrient loss excesses, and to protect in-stream biodiversity. We support the inclusion of in-stream biodiversity values within Farm Environment Plans under Schedule 7. The Orari River Protection Group have established links with farmers to protect nesting endangered birds on the Orari River, as well as endangered fauna in the Orari gorge. We aim to extend this project further along the Orari River. Such work can be included in Farm Environment Plans.

Nitrogen fertilisers need to be restricted with limits enforced and alternative fertilisers encouraged that do not contain water-soluble nitrates. Soil management systems that support soil microorganism biodiversity and clover can be encouraged, such as soil regeneration farming, as these methods enable pasture soils to sequester carbon.

Relief sought

Schedule 7 & Schedule 8

Section: Schedule 8 Region-wide Water Quality Limits

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

Provision

General

Point 80.9

Submission

Appendix 4:

The Orari gorge needs to be included as an “Area of High Naturalness” in the table of significant natural features. The Orari gorge is mentioned in the table as a significant landscape feature, but not that it has been recognised as an “Area of High Naturalness.”

Relief sought

Appendix 4

Section: General

Sub-section: General

Provision

General

Point 80.10

Submission

Overall Time-frame and Central Direction of Plan Change 7:

While all this planning has been taking place for a significant number of years now, our goals for clean rivers and aquifers have been on hold. This has caused continued degradation of water quality and quantity in the Orari river and its aquifers as well as other Canterbury rivers. We wish the OTOP Zone committee to proceed with the implementation of their ZIPA and Plan Change 7 sooner than five years beyond 2022, as we believe this delay will cause further degradation of our Canterbury water.

Overall, we consider that the central direction of the Plan for water management in the OTOP zone and in Canterbury needs to align with the tightening national standards for cleaning up our waterways and aquifers. It also needs to plan goals that align with international standards for clean water called for in recent studies which link nitrate limits higher than 0.8mg/litre to higher rates of bowel cancer.

Our native indigenous fish and invertebrates have been found to need much lower nitrate levels to thrive – between 0.4 and 0.5mg maximum (from Reports by Graham Fenwick & Chris Hickey). This Plan to protect our water needs to have a much better precautionary approach, not allow the contamination of our waterways & aquifers to continue for so much longer. It is socially, morally and ecologically unacceptable that short-term profits for a few should be permitted to put at risk a public resource needed by many thousands of people and also endangered wildlife. This Plan needs to ensure a water supply that is safe for many generations of people as well as ecologically functional for our valuable wildlife. Many farmers are speaking up for better water quality standards, and doing much to protect our water. Other land-holders need to be brought into alignment with their pro-active approach, and this can be ensured with a Water Management Plan that will help us return to outstanding water quality in Canterbury.

Relief sought

Sections 2, 3 & 4

Overall Water Quality Goals & Time-Frame

Section: General

Sub-section: General

Provision

General