

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

By **Taylor, C**

Submitter Identification number: **PC7-555**

Wishes to be heard: **No**

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

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 1:30:29 PM  
Submission #86

### Address for service:

Taylor Colin / 86  
12 Unwin Place Twizel  
Phone: 03.435 3328  
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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 86.1

#### Submission

Proposed Plan 7 – Submission

I am strongly opposed to Policy 4.102 as stated in the Canterbury Land and Water Regional Plan notification under Proposed Plan 7.

I have been a keen New Zealand freshwater angler for over 40 years, reside in Twizel South Canterbury and now, in my retirement, enjoy (at least) 3 days fishing most weeks.

The section labelled "Habitat of Indigenous Freshwater species" (Policy 4.102) appears to be designed to only allow safe passage for indigenous fish and block the movement of salmonids by constructing or modifying restrictive fish structures. The proposal is unhelpful in avoiding a clear definition as to what is meant by "invasive, pest or nuisance fish species". Does ECan intend to include salmon and trout in this undefined group? If restricted, salmon and trout will be blocked from locating their spawning grounds. Clearly, thousands of New Zealand and overseas visitor anglers, along with Fish and Game, who value high water quality and fish stock regeneration, would be most strongly adverse to such obstructions and would not view trout and salmon as "invasive, pest or nuisance fish species".

I regularly fish Lakes Benmore, Ruataniwha, Aviemore, Waitaki, their tributaries, plus the Gray, Twizel, Tekapo, Ohau, Ahuriri and Haketarama rivers (their tributaries), plus the hydro canals. All these waterways draw large numbers of keen anglers nationwide and from the rest of the world. All these anglers greatly value these waters which produces significant economic benefit to New Zealand. Their recreational endeavours make the Mackenzie Basin/Waitaki Valley regions a national asset and tourism drawcard without creating environmental issues such as increasing nitrate levels, toxic algae, unswimable water, etc.

Sadly, throughout Canterbury, historical ECan water management has witnessed resulting adverse water quality. The lack of robust monitoring and policing of farming interests has left the Province with a considerable workload to correct matters. I believe ECan's first responsibility and focus is to return Canterbury to acceptable water quality standards and heeding their 'Canterbury Regional Policy' under which the values of angling are recognized. If water quality continues to remain sub-standard then our indigenous fish are in real trouble.

The proposal change PC7 fails to:-

- 1) Give regard to section 7RMA (which concerns the habitat of trout and salmon).

- 2) Interferes with Fish and Game's requirements under the con Conservation Act Section 26Q.
- 3) Overlooks Water Conservation orders where waters are protected for spawning and angling.

**Relief sought**

4.102

delete provision 4.102

**Section:** Section 4 Policies

**Sub-section:** Section 4 Policies

**Provision**

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:

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