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Subject: Further submission of Te Runanga o Ngai Tahu on Plan Change 7 to the CLWRP (Part A)
Date: Friday, 6 December 2019 10:44:38 AM

Kia ora koutou

Please find attached the further submission of Te Runanga o Ngai Tahu on Plan Change 7 to the CLWRP (Part A).

Nga mihi

Treena Davidson | Senior Advisor – Freshwater | Kaiarahi – Mana

Te Ao Turoa

Te Runanga o Ngai Tahu

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Te Rūnanga o Ngāi Tahu

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Te Rūnanga o NGĀI TAHU

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Regional Plan under Clause 7 of Schedule 1 of the Resource Management Act 1991

FURTHER SUBMISSIONS ON THE PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN – PART A OMNIBUS PLAN CHANGE

6 December 2019

To: Proposed Plan Change 7 to the Land and Water Regional Plan
Environment Canterbury
PO Box 345
Christchurch 8140
mailroom@ecan.govt.nz

Name of person making submission:

Te Rūnanga o Ngāi Tahu (Te Rūnanga)

We have been allocated Submitter ID Number **243** [your reference].

These are further submissions in support or opposition to submissions on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A Omnibus Plan Change.

We are representing a person who has an interest in the proposal that is greater than the general public has.

Introduction and Background

- 1.1. Te Rūnanga o Ngāi Tahu is statutorily recognised as the representative tribal body of Ngāi Tahu whānui and was established as a body corporate on 24th April 1996 under section 6 of Te Rūnanga o Ngāi Tahu Act 1996 (the Act).
- 1.2. Te Rūnanga consists of eighteen Papatipu Rūnanga who uphold the mana whenua and mana moana of their rohe. Ngāi Tahu whānui comprises over 64,000 registered iwi members. The takiwā (region) of Ngāi Tahu in Te Waipounamu covers the largest geographical area of any tribal authority. Te Rūnanga respectfully requests that Canterbury Regional Council accord this response the status and weight due to the tribal collective, Ngāi Tahu whānui, registered in accordance with section 8 of the Act.
- 1.3. Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui “for all purposes”, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses in relation to this matter.
- 1.4. Papatipu Rūnanga are defined in section 9 of the Act. This includes Te Rūnanga o Kaikōura, Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o

Te Rūnanga o Ngāi Tahu
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Website: www.ngaitahu.iwi.nz

Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki.

Relief Sought

We support or oppose the submission points set out in Schedule One. The reasons for our support or opposition are also set out in Attachment 1.

Attachment two contains those parties that have been sent a copy of the further submissions.

We seek that the submissions supported in Schedule 1 be allowed.

We seek that the submissions opposed in Schedule 1 be disallowed.

We DO wish to be heard in support of our further submission.

Signature of person authorised to sign on behalf of persons making further submission.



Trudy Heath
General Manager | Te Ao Tūroa
Te Rūnanga o Ngāi Tahu

Date: 6 December 2019

Address for service:

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Ōtautahi / Christchurch 8021

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Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

Particular parts of the submission supported or opposed	Point number Ngāi Tahu support or oppose the submission of:	Submitter Ngāi Tahu support or oppose the submission of	Summary of Decision Requested	Reason for support or opposition:	Allow or disallow part of the submission
All of Plan Change					
TOPIC					
<u>Farming</u>					
General	PC7-481.4	Rural Advocacy Network	Amend the plan change to remove all references to Mātaitai Protection Zones as a consequential amendment of PC7-481.2.	While acknowledge the confusion about the term Mataitai Protection Zones it is appropriate to protect waipuna (springs) and the waterways which feed into areas of significance to Ngā Rūnanga.	Disallow
Omnibus					
TOPIC					
<u>Environmental Enhancement</u>					
Managed Aquifer Recharge	PC7-218.5	MHV Water Limited (MHV)	Require targeted stream augmentation and managed aquifer recharge activities to be considered together and amend all references to Managed Aquifer Recharge in the PC7 to include "and Targeted Stream Augmentation".	Agree that TAR and MAR should be considered together.	Allow
Managed Aquifer Recharge	PC7-218.11	MHV Water Limited (MHV)	Insert a new definition for Targeted Stream Augmentation as follows: " <u>means an activity that is for the express purpose of improving the quality and/or quantity of water in a receiving surface water body or hydraulically connected groundwater.</u> "	While a definition of TAR may be appropriate if TAR is to apply throughout the Plan the definition should be rationalised with other references to augmentation within the Plan and the definition of TAR provided in Section 8.	Disallow
<u>Habitats of Indigenous Species</u>					
Habitats of Indigenous Species	PC7-481.1	Rural Advocacy Network	Delete the Indigenous Freshwater Species Habitat layer from the Planning Maps in its entirety.	Do not agree with the removal of the Freshwater Species Habitat layers from the maps in their entirety. The species listed are taonga for Ngā Rūnanga and many provide mahinga kai.	Disallow
Habitats of Indigenous Species	PC7-481.3	Rural Advocacy Network	Amend the plan change to remove all references to indigenous freshwater species habitat as a consequential amendment of PC7-481.1.	Do not agree with the removal of all references to indigenous freshwater species habitat from the Plan. The species listed are taonga for Ngā Rūnanga and many provide mahinga kai.	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

Habitats of Indigenous Species	PC7-300.4	Selwyn District Council	Amend the Indigenous Freshwater Species Habitat Maps so that watercourses that are no longer operational and are closed are not captured.	Concern that this change could capture drains that once were rivers or now function as rivers. If any is made it should ensure that before any watercourses are removed from the maps these are thoroughly investigated by freshwater experts to ensure there are no indigenous species present.	Disallow
Habitats of Indigenous Species	PC7-346.4	Meridian Energy	Amend Maps of Indigenous Freshwater Species Habitat to delete the habitats within Lake Benmore and Lake Aviemore.	Do not agree that Lakes Benmore and Lake Aviemore should be removed from the indigenous species habitat list.	Disallow
Habitats of Indigenous Species	PC7-422.15	Genesis Energy Limited	Remove the Indigenous Freshwater Species Habitat that is located in Irishman Creek in the vicinity of the culvert under the Tekapo Canal.	Do not agree with the removal of Indigenous Freshwater Species Habitat from Irishman Creek near the culvert to the Tekapo Canal without investigation of the habitat type and species present.	Disallow
Habitats of Indigenous Species	PC7-422.34	Genesis Energy Limited	Amend provisions related to habitats of indigenous freshwater species to provide for activities within these if they are associated with the operation of significant infrastructure.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
Habitats of Indigenous Species	PC7-551.1	Orari River Protection Group	Include the Orari River in this map as an area of indigenous freshwater species habitat.	Agree that the Orari River be identified as an indigenous freshwater species habitat. The Orari River is an important area for Arowhenua and part of an extensive network of kāinga mahinga kai (food-gathering places) throughout South Canterbury. Several specific kāinga mahinga kai were situated around the river mouth.	Allow
<u>Planning Maps</u>					
Map A-041	PC7-156.9	Trustpower Limited	Amend Map A-041 to include a 40 meter buffer zone within the GIS layer for existing hydro electric power schemes.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
Map A-041	PC7-156.10	Trustpower Limited	Amend Map A-041 to stop the Indigenous Freshwater Species habitat layer before the weir which covers the mouth of the Oakden Canal.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
Map B-041	PC7-156.11	Trustpower Limited	Amend Map B-041 to include a 40 meter buffer zone within the GIS layer for existing hydro electric power schemes.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
Map B-041	PC7-156.12	Trustpower Limited	Amend Map B-041 to stop the Indigenous Freshwater Species habitat layer before the weir which covers the mouth of the Oakden Canal	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
Map B-047	PC7-156.13	Trustpower Limited	Amend Map B-047 to include a 40 meter buffer zone within the GIS layer for existing hydro electric power schemes.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
Map B-047	PC7-156.14	Trustpower	Amend Map B-047 to stop the Indigenous Freshwater Species habitat	Do not agree that significant infrastructure should be exempt	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

		Limited	layer before the weir which covers the mouth of the Oakden Canal	from the need to provide for the habitat of indigenous species	
Map B-048	PC7-156.15	Trustpower Limited	Amend Map B-048 to include a 40 meter buffer zone within the GIS layer for existing hydro electric power schemes.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
Map B-048	PC7-156.16	Trustpower Limited	Amend Map B-048 to stop the Indigenous Freshwater Species habitat layer before the weir which covers the mouth of the Oakden Canal	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
<u>New Policies Requested</u>					
Managed Aquifer Recharge	PC7-153.11	Barrhill-Chertsey Irrigation Limited (BCIL)	<p>Insert a new policy as follows so that when considering applications to take surface water for managed aquifer recharge, the rate of take and/or volume of water sought for abstraction from that surface water body, in combination with all other takes, will not exceed the environmental flows and/or allocation limits in Sections 6 to 15 of the Plan:</p> <p><u>If the applicant holds an existing water permit that authorises the take and use of surface water for irrigation and proposes to use a portion of that water for managed aquifer recharge, that this be permitted.</u></p>	Recognise that an applicant could elect to use water for MAR and if this is a part of an existing take rather than an additional take this might be a better outcome. However, if the water is not needed for its intended use before it is used for MAR the need of that water for the waterbody from which it has been taken should considered first.	Disallow
Managed Aquifer Recharge	PC7-154.8	Acton Farmers Irrigation Co-Operative (AFIC)	Insert an additional policy related to Managed Aquifer Recharge that enables applications to take surface water for Managed Aquifer Recharge be permitted subject to the applicant holding an existing water permit that authorises the take and use of surface water for irrigation, and a portion of water authorised by the existing water permit is being used for Managed Aquifer Recharge, and the rate of take and/or volume of water sought for abstraction, in combination with all other takes does not exceed the environmental flow and allocation limits in Sections 6 to 15 of the LWRP.	Recognise that an applicant could elect to use water for MAR and if this is a part of an existing take rather than an additional take this might be a better outcome. However, if the water is not needed for its intended use before it is used for MAR the need of that water for the waterbody from which it has been taken should considered first.	Disallow
Managed Aquifer Recharge	PC7-235.10	Rangitata South Irrigation Limited	Insert new policy that when considering applications to take surface water for managed aquifer recharge where the rate of take and/or volume of water sought for abstraction from that surface water body, in combination with other takes, will not exceed the environmental flows and/or allocation limits in Sections 6 to 15 of this Plan and if the applicant holds an existing water permit that authorises the take and use of surface water for irrigation and proposes to use a portion of that water for managed aquifer recharge that this be permitted.	Recognise that an applicant could elect to use water for MAR and if this is a part of an existing take rather than an additional take this might be a better outcome. However, if the water is not needed for its intended use before it is used for MAR the need of that water for the waterbody from which it has been taken should considered first.	Disallow
Habitats of Indigenous Species	PC7-472.29	Royal Forest & Bird Protection Society Inc.	Insert a new strategic policy that ensures takes which are not captured by Policy 4.61A consider effects on indigenous freshwater species habitat which is not yet identified or mapped.	The new policy would provide for habitat that is not currently mapped or where indigenous species have expanded their habitat range or moved to an alternative habitat.	Allow
Commercial vege	PC7-356.21	Horticulture	Insert a new policy to support low intensity horticulture as follows:	While agree that the effects of horticulture on the	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

growing		New Zealand	<u>'Recognise that low intensity horticulture has a negligible environmental impact and provide a nutrient management framework that appropriately manages this while improving or maintaining water quality.'</u>	environment is varied, do not consider it is appropriate to have a policy that directs certain activities to a highly permissive planning regime.	
<u>New Rules Requested</u>					
Commercial Vegetable Growing	PC7-153.15	Barrhill-Chertsey Irrigation Limited (BCIL)	Insert permitted activity Rule 5.42CAA as follows: <u>The discharge of nutrients from a commercial vegetable growing operation on a property greater than 4 ha and less than 10 ha and has no natural waterways, springs or wetlands is a permitted activity.</u>	The proposed rule does not recognise or provide for the nature and extent of nutrients that may be discharged from the property nor the effects that this might have on groundwater. Furthermore, it does not recognise the connection of drains to freshwater bodies.	Disallow
Commercial Vegetable Growing	PC7-153.16	Barrhill-Chertsey Irrigation Limited (BCIL)	Insert permitted activity Rule 5.42CAAA as follows: <u>The discharge of nutrients from a commercial vegetable growing operation which does not meet rule 5.42CAA is a permitted activity provided the following conditions are met:</u> <u>The commercial vegetable growing operation is registered in the Farm Portal by 1 July 2020 and the information about the farming activity is reviewed and updated by the commercial vegetable growing operator or their agent every 36 months thereafter, or whenever a material change in the land use associated with the commercial vegetable growing activity occurs; The area of the commercial vegetable growing operation authorised to be irrigated with water is less than 50 ha; and The area of the commercial vegetable growing operation used for winter grazing is less than:10 ha, for a commercial vegetable growing operation less than 100 ha in area; or10% of the area of the commercial vegetable growing operation between 100 ha and 1000 ha in area; or100 ha, for any commercial vegetable growing operation greater than 1000 ha in area; and A management plan has been prepared</u> <u>in accordance with Schedule 7A and is implemented within 12 months of the rule being made operative and supplied to the Canterbury Regional Council on request.</u>	Concern that the effects of the proposed permitted activity on the environment have not been fully considered and the area that will apply is substantive for the effects that may occur.	Disallow
Commercial Vegetable Growing	PC7-356.46	Horticulture New Zealand	Insert a new permitted activity rule after Rule 5.42CA as follows: <u>'5.42XX The discharge of nutrients from Low Intensity Horticulture is a permitted activity.'</u>	The proposed rule does not provide for environment effects and it is not considered that the definition of low intensity horticulture provides insufficient guidance to ensure that the effects will be no more than minor.	Disallow
PLAN PROVISIONS					
Section 2 - How					

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

the Plan Works and Definitions					
<u>Section 2.9 - Definitions, Translations and Abbreviations</u>					
02.09.Baseline commercial vegetable growing area	PC7-472.1	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Baseline commercial vegetable growing area' to provide certainty as to whether the "area of land" is site specific or intended as an aggregate area.	Agree that the definition could be further clarified as to what is meant by "area of land".	Allow
02.09.Baseline commercial vegetable growing area	PC7-472.2	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Baseline commercial vegetable growing area' to provide clarity as to whether the intent is to allow flexibility of crop rotation within that area on that land or within the equivalent area anywhere within the catchment/sub-catchment.	Agree that the definition could be further clarified as to whether or not it is to allow for flexibility of crop rotation within an area of land or within a catchment/sub-sub-catchment.	Allow
02.09.Baseline commercial vegetable growing area	PC7-356.1	Horticulture New Zealand	Amend the term and definition of 'Baseline commercial vegetable growing area' as follows: Baseline commercial vegetable growing <u>production</u> area means the aggregated area of land used for a commercial vegetable growing operation <u>production, including the full sequence of crops and pasture used as part of a rotation</u> , in any 12 month consecutive period within the period of 1 January 2009 to 31 December 2013 <u>between 20 July 2014 to 20 July 2019</u> and under the control (owned or leased) of a single grower or enterprise.	Concern as to the effects of the change in 12-month consecutive period from 1 January 2009 to 31 September 2013 to 20 July 2014 to 20 July 2019 on the baseline nitrate levels that are allowed for the production area.	Disallow
02.09. Commercial vegetabl e growing operatio n	PC7-153.5	Barrhill- Chertsey Irrigation Limited (BCIL)	Amend the definition of 'commercial vegetable growing operation' as follows: Include the term "predominantly vegetable growing" to exclude operations where vegetable growing activities are a minor component of the operation. Expand the definition to allow for other land uses that would benefit from operating under the vegetable growing operation rules framework.	Creates the risk that the provisions for commercial vegetable growing could be used where the activity is secondary to the activities that generally occur on the site.	Disallow
02.09. Commercial vegetable growing	PC7-214.2	Beef + Lamb New Zealand	Amend the definition of 'commercial vegetable growing operation' as follows: Is a sub-set of 'farming activity' and means the growing, for the purpose of commercial gain, of vegetable crops for human consumption, and includes the full sequence of crops and pasture	The effects of a commercial vegetable operation should be assessed not only for the effects on nitrate levels that vegetable growing will have on a site but the effects of other uses of the site as a part of any rotation including any grazing that occurs.	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

operation			used as part of that rotation.		
02.09. Commercial vegetable growing operation	PC7-356.2	Horticulture New Zealand	Amend the term and definition of 'commercial vegetable growing operation' as follows: Commercial vegetable growing operation <u>production</u> is a sub-set of 'farming activity' and means the growing, for the purpose of commercial gain, production of predominantly vegetable crops for human consumption, and includes the full sequence of crops and pasture used as part of that rotation.	While agree with the focus of the definition clarifying that it is predominately for vegetable crops for human consumption consideration should be given to the full sequence of crop and pasture rotation that occurs.	Disallow
02.09. Erroneous Baseline GMP Loss Rate	PC7-425.13	Waimakariri Next Generation Farmers Trust	Insert a definition of when a Baseline GMP Loss Rate or Good Management Practice Loss Rate is demonstrated to be erroneous. Note that the submitter has also sought an alternative option to provide for this request (in the form of amendments to Policy 8.4.28B) in the event that this relief is not adopted.	Agree that there should be clarity for plan users as to what is an erroneous baseline GMP loss rate but concerned that the definition could result in a more permissive approach to nitrate reductions.	Disallow
02.09.Highest groundwater level	PC7-430.3	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete the definition of 'Highest groundwater level' in its entirety, unless sufficient explanation and justification can be provided for the change from 'Seasonal High Water Table'.	Protection should be afforded to protect the mana of the groundwater and to ensure that activities like discharges have sufficient separation distance.	Disallow
02.09.Highest groundwater level	PC7-214.3	Beef + Lamb New Zealand	Amend the definition of 'highest groundwater level' as follows: Means the single highest elevation to which groundwater has historically risen that can be reasonably inferred for the site, based on all available hydrogeological and topographic information. <u>Means, at the time the activity is established, the highest elevation that the water table has reached, taken over an average of the preceding 10 years.</u>	Protection should be afforded to protect the mana of the groundwater and to ensure that activities like discharges have sufficient separation distance.	Disallow
02.09.Highest groundwater level	PC7-428.1	Fulton Hogan Limited	Amend the definition of 'highest groundwater level' as follows: means the single highest elevation to which groundwater has historically risen that can be reasonably inferred for the site, based on all <u>relevant available</u> hydrogeological and topographic information. <u>Where site specific monitoring data over regular intervals exists for a period of 5 years or more, priority shall be given to this information in determining this level.</u> And, if found to be appropriate, change the name of the definition.	Protection should be afforded to protect the mana of the groundwater and to ensure that activities like discharges have sufficient separation distance.	Disallow
02.09.Indigenous freshwater species habitat	PC7-160.38	Department of Conservation	Insert wording to the effect of either with the mapping or as part of the definition as an interim measure if new sites are identified: <u>Where site specific information is available that identifies, better identifies or delineates an Indigenous Freshwater Species Habitat, that</u>	Agree that “ground truthing” is applicable and should be considered when determining a resource consent application.	Allow

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			<u>information must be taken into account when undertaking activities, or when determining resource consent applications for that site.</u>		
02.09.Indigenous freshwater species habitat	PC7-422.4	Genesis Energy Limited	Amend the definition of 'Indigenous freshwater species habitat' to require that this habitat have significant values before being identified as such.	The sites and species identified within the Plan are still only a small subset of the rivers and freshwater species in Canterbury of significance to Ngā Rūnanga and the further addition of additional significant values would undermine the ability to even protect the sites identified.	Disallow
02.09.Indigenous freshwater species habitat	PC7-472.4	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Indigenous freshwater species habitat' so that it is consistent with the Conservation Amendment (Indigenous Freshwater Fish) Bill for species found in Canterbury.	Consider that there is a need to look at the extent of indigenous freshwater species and their freshwater habitats that are provided for in the Plan and how this relates to other legislative protections.	Allow
02.09.Indigenous freshwater species habitat	PC7-472.5	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Indigenous freshwater species habitat' so that it includes indigenous stygofauna.	Consider that there is a need to look at the extent of indigenous freshwater species and their freshwater habitats that are provided for in the Plan and how this relates to other legislative protections.	Allow
02.09.Indigenous freshwater species habitat	PC7-472.6	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Indigenous freshwater species habitat' so that it includes species identified by Allibone and Gray (2018).	Consider that there is a need to look at the extent of indigenous freshwater species and their freshwater habitats that are provided for in the Plan and how this relates to other legislative protections.	Allow
02.09.Indigenous freshwater species habitat	PC7-472.7	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Indigenous freshwater species habitat' so that it includes the full range of Canterbury's indigenous freshwater invertebrates.	Consider that there is a need to look at the extent of indigenous freshwater species and their freshwater habitats that are provided for in the Plan and how this relates to other legislative protections.	Allow
02.09.Indigenous freshwater species habitat	PC7-472.8	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Indigenous freshwater species habitat' so that it gives effect to the NPS-FM 2017 compulsory national value for ecosystem health.	Consider that there is a need to look at the extent of indigenous freshwater species and their freshwater habitats that are provided for in the Plan and how this relates to other legislative protections.	Allow
02.09.Indigenous freshwater species habitat	PC7-472.9	Royal Forest & Bird Protection Society Inc.	Amend the definition of 'Indigenous freshwater species habitat' to delete the reference to mapped habitats to provide for ki uta ki tai and give effect to Te Mana o Te Wai.	Consider that there is a need to look at the extent of indigenous freshwater species and their freshwater habitats that are provided for in the Plan and how this relates to other legislative protections.	Allow
02.09.Indigenous freshwater species habitat	PC7-346.1	Meridian Energy	Amend the definition of Indigenous Freshwater Species Habitat as follows: "means an area identified as 'Indigenous Freshwater Species Habitat' on the Planning Maps, and which provides habitat for at least one of the freshwater species listed below <u>and the species within the habitat is identified on the relevant planning maps:</u> <u>1. Giant kōkopu/Taiwharu (<i>Galaxias argenteus</i>)</u> <u>2. Lowland longjaw galaxias (Waitaki) (<i>Galaxias cobitinis</i>)</u>	The species that are identified for deletion are a mahinga kai species and a taonga to Ngā Rūnanga. The habitat of these species should be protected.	Disallow

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			<p>3. Canterbury mudfish/Kōwaro (<i>Neochanna burrowsius</i>)</p> <p>4. Bignose galaxias (<i>Galaxias macronasus</i>)</p> <p>5. Upland longjaw galaxias (<i>Galaxias prognathus</i>)</p> <p>6. Upland longjaw galaxias (Waitaki) (<i>Galaxias prognathus</i>)</p> <p>7. Shortjaw kōkopu (<i>Galaxias postvectis</i>)</p> <p>8. Northern flathead galaxias (Species N (undescribed))</p> <p>9. Lamprey/Kanakana (<i>Geotria australis</i>)</p> <p>10. Freshwater crayfish/Kekewai (<i>Paraneophraps zealandicus</i>)</p> <p>11. Freshwater mussel/Kōkahi (<i>Echyridellamenezies</i>)"</p>		
02.09.Indigenous freshwater species habitat	PC7-337.2	Christchurch City Council	Amend definition of "Indigenous Freshwater Species Habitat" to include areas where community composition has relatively high proportion of indigenous 'at risk' species e.g. longfin eels, inanga.	Agree that there should be a means to protect habitat where there is a relatively high proportion of 'at risk' species.	Allow
02.09.Low intensity horticulture	PC7-356.10	Horticulture New Zealand	<p>Insert a new definition as follows:</p> <p><u>'Low Intensity Horticulture means fruit, asparagus, vegetables grown under cover, legumes in arable rotations and berries.'</u></p>	Agree in so far as greater clarity could be provided between horticultural activities that have low environmental impact and those that are more intensive. However, concerned about the proposed rules and the areas and extent of land that is sought to be developed, particularly as a permitted activity.	Disallow
02.09.Mahinga kai	PC7-108.6	Pareora Catchment Society (Inc)	<p>Insert definition of mahinga kai as follows:</p> <p><u>[Mahinga kai includes, but is] not limited to, the harvesting of all wild food by anybody i.e. vegetable matter, whitebait, gamebirds, sportsfish, eels and big game animals on public or private land and waterways subject to the provisions of the Wildlife Act (1953) and Conservation Act (1987) RMA (S4) and other statutes and the permission of private land owners. Note; Non-Maori New Zealanders today also have their traditional mahinga kai and traditional wild food harvest rights which are shared by all people and are also in need of protection.</u></p>	Recognise the intent of the definition is to provide for wild food harvesting by non Ngāi Tahu. However, mahinga kai is provided for in the CLWRP and does require a further definition. The proposed definition would also remove the recognition that mahinga kai is central to Ngāi Tahu culture, identity and relationship with landscapes and waterways of Te Wai Pounamu and is not something that is applicable as a broader term for wild food harvesting by non Ngāi Tahu.	Disallow
02.09.Seasonal High Water Table	PC7-430.6	Combined Canterbury Provinces, Federated Farmers of New Zealand	Retain the definition of 'Seasonal High Water Table' unless sufficient explanation and justification can be provided for the replacement of the term with 'Highest groundwater level'.	Protection should be afforded to protect the mana of the groundwater and to ensure that activities like discharges have sufficient separation distance.	
02.09.Vegetation clearance	PC7-160.29	Department of Conservation	<p>Amend the definition of 'vegetation clearance' as follows:</p> <p>means removal of vegetation by physical, mechanical, chemical or other means but excludes: ...</p>	Agree that there should be an amendment to ensure that vegetation clearance does not impact on aquatic indigenous species habitat.	Allow

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			d. clearance for the purposes of maintaining existing fence lines, vehicle tracks, firebreaks, drains, ponds, dams or crossings; ...		
02.09.Wahi Tapu	PC7-108.7	Pareora Catchment Society (Inc)	Amend plan change to accurately define and describe Wāhi Tapu and located by GIS.	Guidance and advice can be obtained from Rūnanga as to wāhi tapu and wāhi taonga. While some sites are identified and provided for in Iwi Environmental Management Plans and in district planning documents it is not possible to provide for or map all sites due considerations like some areas being expansively utilised (for example traditional trails along rivers), the exact location of areas being unknown or sites being confidential and held in silent files.	Disallow
Section 4 - Region-wide Policies					
04.Table 1a	PC7-91.7	Avon-Otakaro Network	Amend 95th percentile <i>e.coli</i> freshwater outcome for Spring-fed-plains Urban in Table 1a as follows: 1200-800	Agree that lower <i>E.coli</i> levels should apply to spring fed plains urban areas.	Allow
04.Table 1a	PC7-214.9	Beef + Lamb New Zealand	Amend Table 1a to provide for primary contact recreation for those sites where primary contact recreation is an identified value during the periods where this activity occurs.	Providing for primary contact recreation should be all year round to allow for safe water use at any time.	Disallow
04.Table 1a	PC7-214.10	Beef + Lamb New Zealand	Amend Table 1a so that <i>E. coli</i> attributes apply during flows below medium flow during the bathing season, and excludes high flow events and periods that fall outside the bathing season.	There should be an intent to keep <i>E.coli</i> levels low throughout the year not just for bathing water. Further, concern that the amendment does not recognise that use of freshwater for mahinga kai is just in summer months.	Disallow
04.Table 1a	PC7-347.4	Canterbury District Health Board	Amend Table 1a to include 'greater than' or 'less than' symbols in association with <i>E.coli</i> figures.	Agree the addition of “greater than” and “less than symbols” for <i>E.coli</i> would clarify the data in the tables.	Allow
04.Table 1a	PC7-347.6	Canterbury District Health Board	Require further investigation on the applicability of 95th percentile figures of 1200 <i>Ecoli</i> /100ml proposed for mahinga kai gathered from water ways.	Agree it is appropriate to look at the <i>E.coli</i> levels suitable to protect human health when harvesting freshwater species.	Allow
04.Table 1a	PC7-337.7	Christchurch City Council	Amend Table 1a to set the target QMCI for hill-fed lower waterways and spring-fed plains waterways to 5 (good-doubtful quality or possible mild pollution).	Agree that hill-fed lower waterways and spring-fed plains waterways should have a QMCI of 5.	Allow
04.Table 1a	PC7-337.149	Christchurch City Council	Amend Table 1a to reduce the <i>E.coli</i> 95th percentile levels to 1000 rather than 1200 for urban waterways and Banks Peninsula,.	Agree that urban waterways and Banks Peninsula should have an <i>E.coli</i> 95 th percentile of 1000 rather than 1200.	Allow
04.Table 1b	PC7-347.7	Canterbury District Health Board	Require further investigation on the applicability of 95th percentile figures of 1200 <i>Ecoli</i> /100ml proposed for mahinga kai gathered from water ways.	Agree it is appropriate to look at the <i>E.coli</i> levels suitable to protect human health when harvesting freshwater species.	Allow
04.006	PC7-356.11	Horticulture New Zealand	Amend Policy 4.6 as follows: '...an individual or community's drinking-water needs, <u>an individual or</u>	This provision is for high naturalness water bodies and the proposed amendment does not align with the objectives of	Disallow

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			community's rootstock and crop survival water needs and water for the operation and maintenance of existing infrastructure.'	the Plan or the principles of the CWMS with regard to the prioritisation of uses water.	
04.047	PC7-428.2	Fulton Hogan Limited	Amend Policy 4.47 to remove the word 'minimised' and/or refer more specifically to the values that need to be considered when undertaking the activity.	Do not agree with the removal of the word minimised as this is what ensures the extent of adverse effects on values are negligible from gravel removal or earthworks.	Disallow
04.047	PC7-356.18	Horticulture New Zealand	Amend Policy 4.47 to add a new clause to recognise maintaining intakes for rootstock and crop survival water as follows: '... <u>f. maintaining intakes for rootstock and crop survival water.</u> '	Concern that this amendment would open it up to allowing for more extensive works for irrigation.	Disallow
04.047	PC7-160.5	Department of Conservation	Amend clause (a) of Policy 4.47 as follows: a. establishing, maintaining or repairing infrastructure <u>provided potential adverse effects on any person, their property, or the ecological, cultural, recreational or amenity values of the fresh waterbody are minimised;</u>	Agree that the effects on values should be minimised for infrastructure.	Allow
04.047	PC7-430.11	Combined Canterbury Provinces, Federated Farmers of New Zealand	Amend clause (b) of Policy 4.47 as follows: b. removing gravel or other earthworks provided potential adverse effects on any person, their property, or the ecological, cultural, recreational or amenity values of the fresh waterbody are minimised <u>as much as practicable;</u>	Minimised already provides a degree of damage to the site and adding the words "as far as practicable" would allow too much discretion as to the extent of the effects that could occur.	Disallow
04.061A	PC7-430.9	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete Policy 4.61A in its entirety.	The provision provides for the preservation of indigenous biological diversity within waterbodies.	Disallow
04.061A	PC7-422.7	Genesis Energy Limited	Amend Policy 4.61A by adding wording to the following effect: <u>This policy does not apply to any abstraction relating to the operation, maintenance, upgrading or replacement of the Tekapo Power Scheme.</u>	Lake Tekapo is a Statutory Acknowledgement area which is also a mahinga kai site and the preservation of indigenous biological species and their habitat within this site is important to Ngāi Tahu.	Disallow
04.061A	PC7-422.8	Genesis Energy Limited	Amend Plan Change 7 to avoid consideration of Policy 4.61A until the details of the values, characteristics and species within each Indigenous Freshwater Species Habitat have been assessed and specified in the plan change.	Concern that this approach delays protection of indigenous species and their habitats that are already under risk from land and water take and use.	Disallow
04.061A	PC7-156.2	Trustpower Limited	Amend Policy 4.61A as follows: Preserve indigenous biological diversity within water bodies by requiring applications to abstract surface water or stream depleting groundwater to assess the potential effects, including cumulative	Do not agree that the existing hydro-electrical power schemes should be exempt from consideration of the effects of its abstraction on indigenous biological diversity and its habitats.	Disallow

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			<p>effects, of the proposed abstraction on any Indigenous Freshwater Species Habitat, and:</p> <p>a. by refusing any application to take water that would reduce the area or compromise the values of the Indigenous Freshwater Species Habitat, except for an application to take water for a community water supply <u>or an existing hydro-electric power scheme</u>; and</p> <p>b. if the application is to take water for a community water supply <u>or an existing hydro-electric power scheme</u> and the take would reduce the area or compromise the values of the Indigenous Freshwater Species Habitat, allow any significant adverse effects on that habitat to be offset by the creation of new habitat in the same surface water catchment and with the same or improved habitat characteristics.</p>		
04.061A	PC7-357.3	DairyNZ Limited	<p>Amend clause (a) of Policy 4.61A as follows:</p> <p>a. by refusing any application to take water that <u>and the take</u> would reduce the area or compromise the values of the Indigenous Freshwater Species Habitat, except for an application to take water for a community water supply; and</p>	Consideration of the effects on the activity on the site should be considered not just whether or not it reduces the area of habitat.	Disallow
04.099	PC7-337.10	Christchurch City Council	Amend Policy 4.99 to include provision for both TSA and MAR.	Agree that TAR and MAR should be managed in similar way.	Allow
04.099	PC7-337.150	Christchurch City Council	Amend Policy 4.99 to make provision for takes which are non-consumptive.	Uncertain as to what ‘non-consumptive’ takes would be provided for in this instance.	Disallow
04.099	PC7-357.4	DairyNZ Limited	<p>Amend clause (a) of Policy 4.99 as follows:</p> <p>a. alternative mitigations, in addition to managed aquifer recharge, have or will be implemented to improve water quality and quantity in the receiving water body, <u>or the benefits of MAR achieve the equivalent benefits of alternative mitigations</u>;</p>	MAR should be in addition to rather than instead of other measures. For example, requiring on-farm nitrate reductions. The proposed wording would mean that MAR could be used instead of changes being made to land use.	Disallow
04.099	PC7-425.2	Waimakariri Next Generation Farmers Trust	<p>Amend clause (c) of Policy 4.99 as follows:</p> <p>c. adverse effects on sites and values of importance to Ngāi Tahu, including effects associated with unnatural mixing of water, are avoided <u>where it is practicable to do so, as far as practicable or otherwise remedied or mitigated to minimise adverse effects</u>;</p>	Ngāi Tahu concerns about mixing of water should be avoided should MAR be proposed.	Disallow
04.099	PC7-356.19	Horticulture New Zealand	<p>Amend clause (d) of Policy 4.99 as follows:</p> <p>'d. adverse effects on the availability, quality and safety of human and animal drinking water, <u>and rootstock and crop survival water</u> are avoided.'</p>	Managed aquifer recharge should only be used where it is intended to enhance the environment and any exceptions to this should be limited only to drinking water needs.	Disallow
04.100	PC7-430.14	Combined	Delete Policy 4.100 and replace as follows:	Managed Aquifer Recharge should not be an option where	Disallow

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		Canterbury Provinces, Federated Farmers of New Zealand	<p><u>When considering the taking of surface water for managed aquifer recharge in relation to the environmental flow and/or allocation limits in Section 6-15 of this plan:</u></p> <p><u>a. Where the rate of take and or volume sought exceeds the environmental flow and/or allocation limits (in Sections 6-15 of this plan), restrict any further over-allocation of surface water to proposals which demonstrate the environmental benefits of the managed aquifer recharge to the receiving waterbody outweigh any adverse effects; and</u></p> <p><u>b. If the applicant holds an existing water permit that authorises the take and use of water for irrigation and proposes to use a portion of that water for managed aquifer recharge,</u></p> <p><u>require that there is no net increase in the total rate or volume of water compared with that authorised under the existing permit.</u></p>	<p>environmental flows or allocation limits are exceeded.</p> <p>Where water is unused the needs for the surface water body from which it was taken should be considered before it is used for MAR.</p>	
04.102	PC7-430.16	Combined Canterbury Provinces, Federated Farmers of New Zealand	<p>Amend Policy 4.102 as follows:</p> <p><u>As far as practicable, 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:</u></p> <p>...</p>	<p>Fish passage should be provided for in all circumstances, addition of the words “as far as practicable” makes it uncertain that fish passage will occur.</p>	Disallow
04.102	PC7-346.7	Meridian Energy	<p>Amend Policy 4.102 as follows:</p> <p>Structures e<u>Enable the safe passage of indigenous fish where appropriate, while avoiding as far as practicable, the passage of any invasive, pest or nuisance fish species by:...</u></p>	<p>Fish passage should be provided for in all circumstances, addition of the words “where appropriate” makes it uncertain that fish passage will occur.</p>	Disallow
04.102	PC7-422.13	Genesis Energy Limited	<p>Amend Policy 4.102 by adding words to the following effect:</p> <p><u>This policy does not apply to any instream structures associated with the Tekapo Power Scheme.</u></p>	<p>Do not agree that significant infrastructure should be exempt from the need to provide for indigenous fish passage.</p>	Disallow
04.102	PC7-156.4	Trustpower Limited	<p>Amend clause (b) of Policy 4.102 as follows:</p> <p><u>b. where reasonably practicable, consider the modification or, reconstruction or removal of existing in-stream structures which impede the safe passage of indigenous fish as required by any new or variation to existing resource consent for that structure.</u></p>	<p>Requiring fish passage where reasonably practicable does not provide any certainty as that fish passage will be provided for.</p>	Disallow
04.102	PC7-346.25	Meridian Energy	<p>Amend clause (b) of Policy 4.102 as follows:</p> <p>b. the modification, reconstruction or removal of existing in-stream structures <u>where this is practicable; or ...</u></p>	<p>Requiring fish passage where reasonably practicable does not provide any certainty as that fish passage will be provided for.</p>	Disallow

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Section 5 - Rules					
05.011	PC7-430.293	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 2 of Rule 5.11.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.019	PC7-430.297	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 2 of Rule 5.19.	The effects on Ngāi Tahu values or sites of significance as a result of the discharge of oil as a dust suppressant should be considered as a matter of discretion.	Disallow
05.040A	PC7-430.21	Combined Canterbury Provinces, Federated Farmers of New Zealand	Amend Rule 5.40A as follows: The use of land for a silage pit for stockpiling of other decaying organic matter (including compost) and any associated discharge into or onto land where a contaminant may enter water that does not meet the condition of Rule 5.40 is a non-complying <u>discretionary</u> activity.	The effects of an activity that cannot meet Rule 5.40 should remain a non-complying activity.	Disallow
05.042CA	PC7-153.14	Barrhill-Chertsey Irrigation Limited (BCIL)	Amend Rule 5.42CA as follows: The discharge of nutrients from a commercial vegetable growing operation on a property 0.5 <u>4</u> hectares or less in area is a permitted activity.	It is uncertain what the effects on the mana of water will be if the scale of operation is increased to 4 hectares.	Disallow
05.042CA	PC7-356.31	Horticulture New Zealand	Amend Rule 5.42CA as follows: 'The discharge of nutrients from a commercial vegetable growing operation on a property 0.5 <u>10</u> hectares or less in area is a permitted activity.	It is uncertain what the effects on the mana of water will be if the scale of operation is increased to 10 hectares.	Disallow
05.042CB	PC7-441.8	Ballance Agri-Nutrients Limited	Amend Rule 5.42CB to include allowance for specific agile working methodologies which may be required to maintain farm operations.	It is uncertain what “agile working methodologies” would be and how these would differ from matters specially addressed within resource consent conditions or Farm Environment Plans.	Disallow

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05.042CB	PC7-356.32	Horticulture New Zealand	<p>Amend Rule 5.42CB as follows:</p> <p>The discharge of nutrients from a commercial vegetable growing operation production that does not meet Rule 5.42CA is a restricted discretionary controlled activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. A Farm Environment Plan has been prepared for the activity in accordance with Part A of Schedule 7 and is submitted with the application for resource consent; and 2. The aggregated area of land used for the commercial vegetable growing operation is no greater than the baseline commercial vegetable growing area; and 3. All land that forms part of the commercial vegetable growing operation is located within the same sub-region and Nutrient Allocation Zone. <p>The exercise of discretion control is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 2. ... 	There should be the ability to decline the consent should it not meet the conditions.	Disallow
05.042CD	PC7-356.38	Horticulture New Zealand	<p>As a consequential amendment of submission point 36 (PC7-356.36) amend Rule 5.42CC as follows:</p> <p>'The discharge of nutrients from a commercial vegetable growing operation that does not comply with condition 1 of Rule 5.42CB or condition 1 <u>or 2</u> of Rule 5.42CC, is a non-complying activity.'</p>	It is appropriate to have a prohibited activity where nitrogen loss rates from a new or expanded commercial vegetable growing operation will be exceeded for that location. This sends a clear message that nitrate reductions must occur in order to maintain or enhance water quality in Canterbury.	Disallow
05.042CE	PC7-356.39	Horticulture New Zealand	Delete Rule 5.42CE in its entirety.	It is appropriate to have a prohibited activity where nitrogen loss rates from a new or expanded commercial vegetable growing operation will be exceeded for that location. This sends a clear message that nitrate reductions must occur in order to maintain or enhance water quality in Canterbury.	Disallow
05.042CE	PC7-430.27	Combined Canterbury Provinces, Federated Farmers of New Zealand	<p>Amend Rule 5.42CE as follows:</p> <p>The discharge of nutrients from a commercial vegetable growing operation that does not comply with condition 2 of Rule 5.42CC is a <u>non-complying prohibited</u> activity.</p>	It is appropriate to have a prohibited activity where nitrogen loss rates from a new or expanded commercial vegetable growing operation will be exceeded for that location. This sends a clear message that nitrate reductions must occur in order to maintain or enhance water quality in Canterbury.	Disallow

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05.093	PC7-292.127	Timaru District Council	<p>As a consequential change to the proposed changes to Schedule 8 direct a change to condition 3 of Rule 5.93 as follows:</p> <p>The discharge of stormwater or construction-phase stormwater from a reticulated stormwater system onto or into land or into or onto land in circumstances where a contaminant may enter water, or into groundwater or a surface waterbody is a restricted discretionary activity, provided the following conditions are met:</p> <p>...</p> <p>3. The discharge will not cause a limit in Schedule 8 to be exceeded. <u>Where Schedule 8 limits are exceeded, priority catchments are agreed to between the reticulated stormwater system operator and the CRC to show positive directional change over time.</u></p> <p>...</p>	It is appropriate that where Schedule 8 limits are exceeded that this is a non-complying activity. There is no certainty as to what an agreed positive directional change over time would be and this could allow considerable adverse effects on the environment to continue for a long period of time.	Disallow
05.115	PC7-214.56	Beef + Lamb New Zealand	Amend Rule 5.115 to provide for existing activities that may be affected by the proposed insertion of matter of discretion 10.	It is appropriate to consider as a matter of discretion the effects of a community water supply on Ngāi Tahu values or sites of significance including addressing existing activities that may have been granted without considering whether or not there are any adverse effects on Ngāi Tahu values or sites.	Disallow
05.115	PC7-292.19	Timaru District Council	<p>Amend matter of discretion 10 of Rule 5.115 as follows:</p> <p>10. Any adverse effects on <u>listed and/or mapped</u> Ngāi Tahu values or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga; and</p>	This is a matter of discretion and Ngāi Tahu values should not need to be mapped or listed as matter of concern. Guidance can be found in Iwi Environment Management Plans and through consultation with the appropriate Rūnanga or their entity.	Disallow
05.115	PC7-292.138	Timaru District Council	If PC7-292.19 is accepted, then clarify that listed and/or mapped Ngāi Tahu values or sites of significance that apply for this rule for consideration on how it effects Timaru District Council interests.	This is a matter of discretion and Ngāi Tahu values should not need to be mapped or listed as matter of concern. Guidance can be found in Iwi Environment Management Plans and through consultation with the appropriate Rūnanga or their entity.	Disallow
05.119	PC7-160.15	Department of Conservation	<p>Amend Rule 5.119 to insert a new condition (as a consequential change from Rule 5.120) as follows:</p> <p><u>10. The take or discharge does not occur adjacent to or in any Indigenous Freshwater Species Habitat.</u></p>	Agree that there should be new condition in Rule 5.119 that protects Indigenous Freshwater Species Habitat from discharges.	Allow
05.120	PC7-292.21	Timaru District Council	<p>Amend matter of discretion 2 of Rule 5.120 as follows:</p> <p>2. Any adverse effects on <u>listed and/or mapped</u> Ngāi Tahu values or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga; and</p>	This is a matter of discretion and Ngāi Tahu values should not need to be mapped or listed as matter of concern. Guidance can be found in Iwi Environment Management Plans and through consultation with the appropriate Rūnanga or their entity.	Disallow
05.120	PC7-292.139	Timaru District	If PC7-292.21 is accepted, then clarify that listed and/or mapped Ngāi	Any concerns with how Ngāi Tahu values and sites of	Disallow

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		Council	Tahu values or sites of significance that apply for this rule for consideration on how it affects Timaru District Council interests.	significance that might affect Timaru District Council community water supplies can be addressed through direct consultation with Ngā Rūnanga.	
05.123	PC7-430.306	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 14 of Rule 5.123.	The effects on Ngāi Tahu values or sites of significance as a result taking or use of surface water should be considered as a matter of discretion.	Disallow
05.126	PC7-430.307	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 9 of Rule 5.126.	The effects on Ngāi Tahu values or sites of significance as a result of the taking or use should be considered as a matter of discretion.	
05.128	PC7-430.308	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 12 of Rule 5.128.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.128	PC7-214.59	Beef + Lamb New Zealand	Amend Rule 5.128 to provide for existing activities that may be affected by the change.	It is appropriate to consider as a matter of discretion the effects of a community water supply on Ngāi Tahu values or sites of significance including addressing existing activities that may have been granted without considering whether or not there are any adverse effects on Ngāi Tahu values or sites.	
05.133	PC7-430.309	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 8 of Rule 5.133.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.133	PC7-292.23	Timaru District Council	Amend matter of discretion 8 of Rule 5.133 as follows: 8. Where there is a change to the use of the water or a change in the location the water is proposed to be used, any adverse effects on <u>listed and/or mapped</u> Ngāi Tahu values or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga.	This is a matter of discretion and Ngāi Tahu values should not need to be mapped or listed as matter of concern to Ngāi Tahu are guided by Iwi Environment Management Plans and through consultation with the appropriate Rūnanga or their entity.	

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05.133	PC7-472.58	Royal Forest & Bird Protection Society Inc.	Amend Rule 5.133 to insert the requirement to publicly notify for a change of use or change in location.	Agree that there should be the ability to publicly notify or limited notify resources consents for permanent or temporary transfer of water.	Allow
05.133	PC7-292.140	Timaru District Council	If PC7-292.23 is accepted, then clarify that listed and/or mapped Ngāi Tahu values or sites of significance that apply for this rule for consideration on how it affects Timaru District Council interests.	Any concerns with how Ngāi Tahu values and sites of significance that might affect Timaru District Council community water supplies can be addressed through direct consultation with Ngā Rūnanga.	
05.136	PC7-430.37	Combined Canterbury Provinces, Federated Farmers of New Zealand	Amend Rule 5.136 to delete the reference to indigenous freshwater species habitat.	Do not agree that the installation, alteration, extension or removal of pipes, ducts, cablese or wires should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.136	PC7-472.63	Royal Forest & Bird Protection Society Inc.	Amend condition 1 of Rule 5.136 as follows (or similar): 1. The activity is not undertaken in, on, or under the bed of a lake listed as a high naturalness lake in Sections 6 to 15 or in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June <u>and 1 September to 1 December</u> inclusive, or in any Indigenous Freshwater Species Habitat; and	Consider it is appropriate to amend conditions to protect indigenous freshwater species at least during critical stages of their life cycle	Allow
05.136	PC7-346.8	Meridian Energy	Amend condition 1 of Rule 5.136 as follows: "1. The activity is not undertaken in, on, or under the bed of a lake listed as a high naturalness lake in Sections 6 to 15 or in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Waitaki Power Scheme</u> ; and ..."	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.136	PC7-422.16	Genesis Energy Limited	Amend condition 1 of Rule 5.136 as follows 1. The activity is not undertaken in, on, or under the bed of a lake listed as a high naturalness lake in Sections 6 to 15 or in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.137	PC7-430.38	Combined Canterbury Provinces,	Amend Rule 5.137 to delete the reference to indigenous freshwater species habitat.	Do not agree that the installation, alteration, extension or removal of bridges and culverts should be exempt from the need to provide for the habitat of indigenous species	

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

		Federated Farmers of New Zealand			
05.137	PC7-472.62	Royal Forest & Bird Protection Society Inc.	Amend Rule 5.137 so that the conditions protect indigenous freshwater species at least during the critical stages of their life cycle.	Consider it is appropriate to amend conditions to protect indigenous freshwater species at least during critical stages of their life cycle.	Allow
05.137	PC7-472.64	Royal Forest & Bird Protection Society Inc.	Amend condition 4 of Rule 5.137 as follows (or similar): 4. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June <u>and 1 September to 1 December</u> inclusive, or in any Indigenous Freshwater Species Habitat; and...	Consider it is appropriate to amend conditions to protect indigenous freshwater species at least during critical stages of their life cycle.	Allow
05.137	PC7-346.9	Meridian Energy	Amend condition 4 of Rule 5.137 as follows: "4. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Waitaki Power Scheme</u> ; and ..."	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.137	PC7-422.17	Genesis Energy Limited	Amend condition 4 of Rule 5.137 as follows: 4. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.137	PC7-343.44	Ashburton River Irrigators Association	Amend condition 4 of Rule 5.137 as follows: 4. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat ; and	Do not agree that bridges and culverts should be exempt from the need to provide for the protection of significant habitats of indigenous species.	Disallow
05.138	PC7-422.18	Genesis Energy Limited	Amend condition 2 of Rule 5.138 as follows 2. Other than for the use of defences against water the activity is not in, on, or under the bed of any river or lake listed as a high naturalness waterbody in Sections 6 to 15 or in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

05.138	PC7-343.45	Ashburton River Irrigators Association	Amend condition 2 of Rule 5.138 as follows: 2. Other than for the use of defences against water the activity is not undertaken in, on or under the bed of any river or lake listed as a high naturalness waterbody in Sections 6 to 15 or within a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat , and	Do not agree that defences against water should be exempt from the need to provide for the protection of significant habitats of indigenous species	Disallow
05.139	PC7-156.5	Trustpower Limited	Amend condition 4 of Rule 5.139 as follows: 4. Except for bridges, culverts, pipes, ducts, cables and wires and their associated support structures <u>or structures associated with existing hydro-electric power schemes</u> , the maintenance of that part of the structure within the bed of a lake or river is not undertaken within a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.139	PC7-156.6	Trustpower Limited	Amend Rule 5.139 to include a 40 metre buffer zone within the GIS layer for existing hydro electric power schemes.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.139	PC7-346.10	Meridian Energy	Amend condition 4 of Rule 5.139 as follows: "4. Except for bridges, culverts, pipes, ducts, cables and wires and their associated support structures, the maintenance of that part of the structure within the bed of a lake or river is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Waitaki Power Scheme</u> ; and ..."	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.139	PC7-422.19	Genesis Energy Limited	Amend condition 4 of Rule 5.139 as follows: 4. Except for bridges, culverts, pipes, ducts, cables and wires and their associated support structures the maintenance of that part of the structure within the bed of a lake or a river is not undertaken within a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> .	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.141A	PC7-430.54	Combined Canterbury Provinces, Federated Farmers	Amend the activity status of Rule 5.141A to a restricted discretionary activity, and insert matters of discretion to cover the conditions in Rules 5.135 to 5.141.	Rules 5.135 – 5.141 cover a range of activities and concerned that if made restricted discretionary the full effects of these activities may not be able to be assessed.	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

		of New Zealand			
05.141A	PC7-422.23	Genesis Energy Limited	Amend Rule 5.141A to exempt activities associated with the Tekapo Power Scheme where they fall within areas of Indigenous Freshwater Species Habitat.	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.151	PC7-428.7	Fulton Hogan Limited	Amend condition 5 of Rule 5.151 as follows: 5. For any temporary culvert in a river: a. The maximum length of the culvert is 10m 14m;...	The maximum length of culvert is a substantive length and the effects on fish passage and aquatic habitat need to be considered.	Disallow
05.151	PC7-422.25	Genesis Energy Limited	Amend condition 2 of Rule 5.151 as follows: 2. The discharge is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.152	PC7-430.53	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete condition 3 of Rule 5.152 (until the required concentrations of suspended solids are technically justified).	Consider that it is appropriate to have levels of concentrations of suspended solids as a permitted activity.	Disallow
05.152	PC7-430.46	Combined Canterbury Provinces, Federated Farmers of New Zealand	Amend Rule 5.152 to delete the reference to indigenous freshwater species habitat.	Do not agree that it is appropriate to undertake temporary discharges into habitats of significant indigenous species.	Disallow
05.152	PC7-422.26	Genesis Energy Limited	Amend condition 1 of Rule 5.152 as follows: 1. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.152A	PC7-430.57	Combined Canterbury Provinces, Federated Farmers of New Zealand	Amend the activity status of Rule 5.152A to a restricted discretionary activity, and insert matters of discretion to cover the conditions in Rules 5.151 and 5.152.	Full discretion should be applied to the placement, use, maintenance and removal of temporary structures that do not meet the permitted activity rules.	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

05.152A	PC7-422.27	Genesis Energy Limited	Amend condition 2 of Rule 5.152A as follows: 2. The discharge is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species	Disallow
05.154	PC7-160.27	Department of Conservation	Amend condition 2 of Rule 5.154 to insert a new clause as follows: 2. For the damming of water in the bed of a river and the constructing, altering, using, maintaining and operating of dam structures within the bed of a river: ... <u>h. the dam, its operation and impoundment area is not in any Indigenous Freshwater Species Habitat.</u>	Agree that it is appropriate to ensure that dams are not within indigenous freshwater species habitat.	Allow
05.163	PC7-160.28	Department of Conservation	Amend Rule 5.163 to insert a new condition as follows: <u>11. The activity does not prevent fish passage or result in the stranding of fish.</u>	Agree that there should be provision for fish passage and prevention of stranding of fish.	Allow
05.163	PC7-346.17	Meridian Energy	Amend condition 7 of Rule 5.163 as follows: "7. Vegetation clearance does not occur in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Waitaki Power Scheme</u> ; and ..."	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.163	PC7-422.28	Genesis Energy Limited	Amend condition 7 of Rule 5.163 as follows: 7. Vegetation clearance does not occur in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.164	PC7-430.311	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 2 of Rule 5.164.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.167	PC7-160.30	Department of Conservation	Amend condition 5 of Rule 5.167 as follows: 5. The vegetation clearance does not occur adjacent to a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat	Agree that it is important to consider the effects of vegetation clearance adjacent to the habitat area can affect the species.	Allow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

			during the period of 1 January to 1 June inclusive, <u>adjacent to</u> or in any Indigenous Freshwater Species Habitat; and		
05.167	PC7-300.2	Selwyn District Council	Amend condition 5 of Rule 5.167 as follows: 5. The vegetation clearance does not occur adjacent to a salmon spawning site listed in Schedule 17 or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, or in any Indigenous Freshwater Species Habitat, <u>except that where works are undertaken by the territorial authority in accordance with an adopted a Management Plan developed under the Local Government Act</u> ; and	Council activities should not be exempt from protecting indigenous species freshwater habitat and inanga spawning sites.	Disallow
05.167	PC7-346.18	Meridian Energy	Amend condition 5 of Rule 5.167 as follows: "5. The vegetation clearance does not occur adjacent to a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Waitaki Power Scheme</u> ; and ..."	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.167	PC7-422.29	Genesis Energy Limited	Amend condition 5 of Rule 5.167 as follows: 5. The vegetation clearance does not occur adjacent to a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.168	PC7-160.31	Department of Conservation	Amend condition 3 of Rule 5.168 as follows: 3. The activity does not occur adjacent to a salmon spawning area listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, <u>adjacent to</u> or in any Indigenous Freshwater Species Habitat; and	Agree that it is important to consider the effects of vegetation clearance adjacent to the habitat area can affect the species.	
05.168	PC7-300.3	Selwyn District Council	Amend condition 3 of Rule 5.168 as follows: 3. The vegetation clearance does not occur adjacent to a salmon spawning site listed in Schedule 17 or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, or in any Indigenous Freshwater Species Habitat, <u>except that where works are undertaken by the territorial authority in accordance with an adopted a Management Plan developed under the Local Government Act</u> ; and	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	
05.168	PC7-346.19	Meridian Energy	Amend condition 3 of Rule 5.168 as follows: "3. The activity does not occur adjacent to a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, or in any Indigenous	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

			Freshwater Species Habitat <u>unless the activity is associated with the Waitaki Power Scheme; and ..."</u>		
05.168	PC7-422.30	Genesis Energy Limited	Amend condition 3 of Rule 5.168 as follows: 3. The activity does not occur adjacent to a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, or in any Indigenous Freshwater Species Habitat <u>unless the activity is associated with the Tekapo Power Scheme; and</u>	Do not agree that significant infrastructure should be exempt from the need to provide for the habitat of indigenous species.	Disallow
05.170	PC7-224.4	Rayonier New Zealand Limited and Port Blakely Limited	Delete condition 5 of Rule 5.170, or alternatively amend to address the various issues raised by the submitter for the provision.	Concern that the removal of provisions relating to suspended solids when undertaking forestry activities will have an adverse effect on mahinga kai.	Disallow
05.170	PC7-224.5	Rayonier New Zealand Limited and Port Blakely Limited	Delete condition 6 of Rule 5.170, or alternatively amend to address the various issues raised by the submitter for the provision.	Concern that the removal of provisions relating to suspended solids when undertaking forestry activities will have an adverse effect on mahinga kai.	Disallow
05.176	PC7-430.312	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 5 of Rule 5.176.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.177	PC7-428.9	Fulton Hogan Limited	Delete condition 7 of Rule 5.177.	Land use deposition should consider how a site is rehabilitated.	Disallow
05.177	PC7-428.12	Fulton Hogan Limited	Delete matter of discretion 3 of Rule 5.177.	Deposition of material should have an adequate separation distance from groundwater to reduce any effects of leaching.	Disallow
05.178	PC7-430.313	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 6 of Rule 5.178.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.180	PC7-430.314	Combined	Delete matter of discretion 4 of Rule 5.180.	It is appropriate to require consideration of whether or not	Disallow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

		Canterbury Provinces, Federated Farmers of New Zealand		the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	
05.191	PC7-430.315	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete matter of discretion 14 of Rule 5.191.	It is appropriate to require consideration of whether or not the activity will have any adverse effects on Ngāi Tahu values or sites of significance to Ngāi Tahu as a matter of discretion.	Disallow
05.191	PC7-422.31	Genesis Energy Limited	Amend Rule 5.191 to ensure activities considered under this rule must avoid adverse effects on the operation of the Tekapo Power Scheme.	Do not agree that significant infrastructure should be exempt from consideration of the effects on Ngāi Tahu values and sites of significance and on the habitat of indigenous species	
05.192	PC7-337.154	Christchurch City Council	Amend Rule 5.192 to provide for targeted stream augmentation in a similar manner as proposed by PC7 in Section 8 (Rules 8.5.18, 8.5.19 and 8.5.20).	Agree it is appropriate to consider and provide for TAR in the same manner as MAR.	Allow
Section 11 - Selwyn-Te Waihora					
<u>Section 11.2A - Selwyn Te Waihora Definitions</u>					
11.02A Augmentation	PC7-430.145	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete the proposed amendment to the definition of 'Augmentation' in Section 11 unless there is a clear and demonstrable advantage in retaining the amendment.	Consider it is appropriate to address TAR and MAR consistently throughout the Plan and this is best done through a clear set of provisions at the Regional level rather than at the Zone level.	
<u>Section 11.4 - Policies</u>					
11.04.22	PC7-430.146	Combined Canterbury Provinces, Federated Farmers of	Delete the proposed amendment to Policy 11.4.22.	Consider it is appropriate to address TAR and MAR consistently throughout the Plan and this is best done through a clear set of provisions at the Regional level rather than at the Zone level.	Disagree

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

		New Zealand			
Section 11.5 Rules					
11.05.35	PC7-430.150	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete the proposed amendment to Rule 11.5.35.	Consider it is appropriate to address TAR and MAR consistently throughout the Plan and this is best done through a clear set of provisions at the Regional level rather than at the Zone level.	Disallow
11.05.42	PC7-430.151	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete the proposed amendment to the heading of 'Augmenting Surface Water' so that it reads 'Augmenting <u>Groundwater or Surface Water</u> '.	Consider it is appropriate to address TAR and MAR consistently throughout the Plan and this is best done through a clear set of provisions at the Regional level rather than at the Zone level.	Disallow
11.05.42	PC7-430.153	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete the proposed amendments to Rule 11.5.42.	Consider it is appropriate to address TAR and MAR consistently throughout the Plan and this is best done through a clear set of provisions at the Regional level rather than at the Zone level.	Disallow
11.05.43	PC7-430.154	Combined Canterbury Provinces, Federated Farmers of New Zealand	Delete the proposed amendments to Rule 11.5.43.	Consider it is appropriate to address TAR and MAR consistently throughout the Plan and this is best done through a clear set of provisions at the Regional level rather than at the Zone level.	Disallow
Section 13 - Ashburton					
Section 13.5 - Rules					
13.05.30	PC7-430.168	Combined Canterbury Provinces, Federated Farmers of New Zealand	Amend condition 5 of Rule 13.5.30 as follows: 5. The take is from deep groundwater or the application for resource consent demonstrates that the take <u>will not have a direct or high stream depletion effect</u> is not from stream depleting groundwater; and	The proposed amendment creates uncertainty as to what a “high stream depletion effect” is and therefore how the effects of groundwater take on surface water will be minimised.	Disallow
13.05.36	PC7-472.148	Royal Forest &	Amend Rule 13.5.36 to insert a condition to avoid adverse effects on	Agree that a matter for discretion should include adverse	Allow

Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

		Bird Protection Society Inc.	significant indigenous species or habitat of indigenous fauna.	effects on significant indigenous species or habitats of indigenous fauna.	
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Attachment 2: Further submission of Ngā Rūnanga on Plan Change 7 to the Canterbury Land and Water Regional Plan – Part A (Omnibus) – parties served with a copy

Submitter Ngāi Tahu support or oppose the submission of	Further submission served by	Email address
Acton Farmers Irrigation Co- Operative (AFIC)	Email	eva@irrigo.co.nz
Ashburton River Irrigators Association	Email	eva@irrigo.co.nz
Avon-Otakaro Network	Email	kyleavon@outlook.com
Ballance Agri-Nutrients Limited	Email	dominic.adams@ballance.co.nz
Barrhill-Chertsey Irrigation Limited (BCIL)	Email	eva@irrigo.co.nz
Beef + Lamb New Zealand	Email	lauren.phillips@beeflambnz.com
Canterbury District Health Board	Email	alizon.paterson@cdhb.health.nz
Christchurch City Council	Email	peter.kingsbury@ccc.govt.nz
Combined Canterbury Provinces, Federated Farmers of New Zealand	Email	lhume@fedfarm.org.nz
DairyNZ Limited	Email	charlotte.wright@dairynz.co.nz
Department of Conservation	Email	gdeavoll@doc.govt.nz
Fulton Hogan Limited	Email	tensor@tonkintaylor.co.nz -
Genesis Energy Limited	Email	alice.barnett@genesisenenergy.co.nz
Horticulture New Zealand	Email	rachel.mcclung@hortnz.co.nz
Meridian Energy	Email	andrew.feierabend@meridian.co.nz
MHV Water Limited (MHV)	Email	ben.williams@chapmantripp.com, rachel.robilliard@chapmantripp.com
Orari River Protection Group	Email	adelecoombs@y7mail.com
Pareora Catchment Society (Inc)	Email	th0mas@xtra.co.nz
Rangitata South Irrigation Limited	Email	john@bcewater.co.nz, johanna.king@tp.co.nz
Rayonier New Zealand Limited and Port Blakely Limited	Email	chris.fowler@adderleyhead.co.nz, amuri.hughey-cockerell@adderleyhead.co.nz
Royal Forest & Bird Protection Society Inc.	Email	n.snoyink@forestandbird.org.nz
Rural Advocacy Network	Email	info@ruraladvocacynetwork.nz
Selwyn District Council	Email	Benjamin.Rhodes@selwyn.govt.nz
Timaru District Council	Email	kate.walkinshaw@timdc.govt.nz
Trustpower Limited	Email	nicola.foran@trustpower.co.nz
Waimakariri Next Generation Farmers Trust	Email	waimak.ngf@gmail.com

From: [Treena Davidson](#)
To: [Tavisha Fernando](#)
Subject: RE: Further Submission - Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan
Date: Tuesday, 7 January 2020 3:25:15 PM

Kia ora Tavisha

Best wishes for the new year to you too.

Thank you for checking on the omissions that we have made from our further submission.

The amendments are:

430.6 – Page 10 – **disallow**
430.307, 214.59, 292.233 – Page 18 – **disallow**
292.140, 430.38 – Page 19 – **disallow**
160.31, 300.3 – Page 24 - **160.31 – allow , 300.3 – disallow**
422.31, 430.145 – Page 26 – **disallow**

Nga mihi

Treena Davidson | Senior Advisor – Freshwater | Kaiarahi – Mana

Te Ao Turoa

Te Runanga o Ngai Tahu

Te Whare o Te Waipounamu | 15 Show Place | Addington | PO Box 13 046 | Christchurch 8141

Mobile: +64 21 716308 |

Imera: Treena.davidson@ngaitahu.iwi.nz



Te Rūnanga o Ngāi Tahu

From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>

Sent: Tuesday, 7 January 2020 2:06 p.m.

To: Treena Davidson <Treena.Davidson@ngaitahu.iwi.nz>

Subject: Further Submission - Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Tena koe Treena

I hope you enjoyed the festive period, best wishes for 2020.

We are currently processing further submissions on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan and Proposed Plan Change 2 to the Waimakariri River Regional Plan.

We note that the Allow/Disallow column has been left blank on the following further submission points;

430.6 – Page 10

430.307, 214.59, 292.233 – Page 18

292.140, 430.38 – Page 19

160.31, 300.3 – Page 24

422.31, 430.145 – Page 26

In order for us to ensure that these are recorded correctly, please can you confirm whether you support or oppose these submission points.

Nga mihi

Tavisha

Tavisha Fernando

Planning Officer Hearings

Environment Canterbury

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