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**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 LWRP Further Submission  
**Date:** Friday, 6 December 2019 2:43:37 PM

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On behalf of the Avon-Otakaro Network.

Nga mihi

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6 December 2019

**TO:** Environment Canterbury Regional Council  
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## Further submission on the Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

1. The Avon-Otakaro Network is a non-profit community group that advocates for THE MAXIMUM POSSIBLE RESTORATION OF NATIVE ECOSYSTEMS, to enhance water quality, biodiversity and environmental resilience which in turn support mana whenua aspirations for restored mahinga kai values. This is why we have made a submission on proposed PC7.
2. The Avon-Otakaro Network could not gain an advantage in trade competition through this submission.
3. The Avon-Otakaro Network wishes to be heard in support of this submission, and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

### Introduction

4. The Avon-Otakaro Network is concerned that some of the decisions sought to the Regional Plan would result in loss of indigenous biodiversity and are inconsistent with the National Policy Statement for Freshwater Management 2014 (amended 2017) ("NPS FM"). The Avon-Otakaro Network also supports a number of submissions which seek to retain or amend provisions of the plan to protect, maintain and enhance freshwater quality and the indigenous biodiversity of the region. Our further submissions are set out in the Table 1 below.

**Table 1:** The Avon-Otakaro Network supports or opposes the following submissions or parts of submissions as set out below.

<b>Submitter ID</b>	<b>Submitter Name</b>	<b>particulars provision/ submission point</b>	<b>Support/ Oppose</b>	<b>Reason for Support/Opposition</b>	<b>Decision sought</b>
160	Department of Conservation	all	support	The amendments sought give effect to the NPS FM, the RPS and Part 2 of the RMA	Allow
351	Central South Island Fish and Game	all	support	The amendments sought give effect to the NPS FM, the RPS and Part 2 of the RMA	Allow
95	North Canterbury Fish and Game Council	all	support	The amendments sought give effect to the NPS FM, the RPS and Part 2 of the RMA	Allow
430	North Canterbury Province, Federated Farmers of New Zealand	all	oppose	The amendments sought will result in a loss of indigenous biodiversity values which is inconsistent with council's functions and responsibilities under section 30(1) (ga) and Section 6 the RMA. The amendments sought do not give effect to the NPS FM and the NZCPS.	Disallow
416	Fonterra Co-operative Group Limited (Fonterra)	all	oppose	Many of the concerns raised are valid however the relief sought does not ensure the maintenance, protection or enhancement of indigenous biodiversity values.	Disallow
423	Te Rūnanga o Ngāi Tahu and Te Rūnanga o Kaikōura, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga,	all	support	The amendments sought give effect to the NPS FM, the RPS and Part 2 of the RMA	Allow

	Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki (Collectively referred to as Ngā Rūnanga)				
356	Horticulture New Zealand	all	oppose	<p>Many of the concerns raised are valid however the relief sought does not ensure the maintenance, protection or enhancement of indigenous biodiversity values, and does not give effect to the NPSFM.</p> <p>In particular Avon-Otakaro Network's reasons are that:</p> <ul style="list-style-type: none"> <li>• The framework proposed by the submitter does not put the wellbeing of the water body first.</li> <li>• The proposed framework for low intensity horticulture is uncertain, particularly in the context of integrated management approach and cumulative effects.</li> <li>• The considerations for MAR and TSA are particularly concerning as this creates a reliance on augmentation rather than ensuring development and use is within environmental limits.</li> </ul>	Disallow
457	Mackenzie District Council	Key areas of support/ concern	oppose	The Avon-Otakaro Network opposes the following matters identified in the key areas of concern for the following reasons:	Disallow

		identified in the submission		<p>Policy 14.4. 10 It is unclear whether the submitter seeks changes to this policy. We are concerned that the reasoning set out in the submission is not applied to establishing an allocation framework. The framework needs to build in sufficient allocation and contingency for municipal supplies ahead of takes for other uses.</p> <p>The 2 step process We understand the concerns with this however it would not be appropriate to split the consideration of the second step to a separate plan change.</p> <p>Timeframes Any delays in achieving nutrient management would place increased costs on future generations, is not precautionary and allows for irreversible effects on the health of water to occur in the interim.</p>	
138	Canterbury Aoraki Conservation Board	all	support	The amendments sought will improve water quality and indigenous habitat values. In particular actions to reduce nutrient discharges and avoid new discharges needs to be brought forward.	allow
390	Ashburton Lyndhurst Irrigation Limited	all	oppose	The amendments sought do not ensure the maintenance, protection or enhancement of indigenous biodiversity values.	disallow
441	Ballance Agri-Nutrients Limited	Timeframes and targets	oppose	The changes to timeframes and targets for nutrient management and loss do not result in improvements or ensure the maintenance of water quality within appropriate timeframes.	Disallow

				The new policies proposed are uncertain.	
337	Christchurch City Council	nutrient management and freshwater	support	The outcomes sought support an improvement in the water quality of the Waimakariri River and will improve both surface and groundwater indigenous habitat values associated with the river.	Allow
357	DairyNZ Limited	Section 4 policies	oppose	The amendments sought to the section 4 policies are uncertain or will otherwise result in a loss of indigenous biodiversity values.	Disallow
214	Beef & Lamb	all	oppose	<p>The amendments sought create uncertainties for the implementation of plan provision and would result in a loss of indigenous biodiversity values. In particular:</p> <ul style="list-style-type: none"> <li>• Changes to nitrogen standards based on soil capacity and assimilative capacity of water is not consistent with maintaining and improving values.</li> <li>• An “equitable” approach may not be appropriate to achieve environmental outcomes given across a catchment and locational requirements for habitat and legislative requirements.</li> <li>• Provide for flexibility in Nitrogen use and discharges even where these are low level is not appropriate to ensure the maintenance and enhancement of environmental values and may ignore cumulative effects.</li> <li>• The consideration for specific mitigation to provide for future aspirations does not appear to relate to the primary matter being considered or ensure certainty of mitigation requirements and effects to be addressed.</li> </ul> <p>The tailoring of regulatory methods to a sub-catchment</p>	Disallow

				may be beneficial where local environmental issues can be better addressed; however a sub-catchment approach has not been progressed for alpine rivers.	
171	Waimakariri Group	1. Managed Aquifer Recharge	support	<ul style="list-style-type: none"> <li>For the reasons set out in the submission and as the amendments sought give effect to the NPS FM and Part 2 of the RMA</li> </ul>	Allow
339	Graham Fenwick	all	support	For the reasons set out in the submission and as the amendments sought give effect to the NPS FM and Part 2 of the RMA	Allow
88	Water and Wildlife Habitat Trust	all	Support	The amendments sought provide for the protection and maintenance of indigenous biological diversity and give effect to the NPS FM and Part 2 of the RMA	Allow

Thank you for your consideration.

Ngā mihi

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