

Appendix 2 - Christchurch City Council detailed submission on Package 2: Primary Sector

	Policy or Clause	Topic	Submission	Relief sought	Reasons
	National Environmental Standard – Marine Aquaculture				
1	General comments	We note that there should be consideration of climate change and resilience to natural hazards in the NES-MA, particularly as sea levels rise and the incidence of storms and marine heatwaves increase.			
	National Environmental Standards – Commercial Forestry				
2	General comments	<p>We recognise that the proposals to amend the NES-CF could improve clarity and reduce duplication. From a consenting perspective, the changes related to when councils can impose more stringent rules than the NES could provide greater clarity when processing applications.</p> <p>Despite the benefits of these proposals, we think that, on balance, the proposed changes will limit Council's ability to adequately manage the risks associated with commercial forestry, in particular wildfire risk in the Christchurch District. As noted in our cover letter, Christchurch City Council has incurred significant costs in relation to firefighting following successive fires in the Port Hills in 2017 and 2024. For this reason, we do not support the proposal to repeal Regulation 6(4A).</p>			
3	Regulation 6(1)	Amendments to Regulation 6(1) National Instruments	Clarify	Clarify ‘severe erosion’ and its application	In relation to 6(1)(a), ‘severe erosion’, should be defined to reduce uncertainty for both authorities and applicants. The NES also already defines zones in relation to erosion risk, and it is unclear how mapped erosion risk areas under the proposed amendment would interact with existing zones under the NES (i.e. could severe risk only be identified in higher risk category zones).
4	Regulation 6(4A)	Proposal to remove Regulation 6(4A)	Reject	Reject proposal and keep Regulation 6(4A)	Council opposes the proposed removal of Regulation 6(4A) because it will limit Council’s ability to consider afforestation effects which are not managed by the NES-CF (for example Christchurch District Plan Policy

					<p>17.2.2.9.a on fire risk or cultural landscapes). Removing Regulation 6(4A) will limit the Council's ability to consider fire risk to nearby residential activities and urban areas. Managing wildfire risk is a pressing issue for the Council. The 2022 Climate Change Risk Screening for Ōtautahi Christchurch and Te Pātaka-o-Rākaihautū Banks Peninsula states that the risk of wildfire will increase, especially in high winds and drought, when water is scarce for firefighting.</p> <p>While we acknowledge that removing Regulation 6(4A) has the potential to provide greater clarity for Council and applicants, we do not think this benefit outweighs the potential risks associated with reducing Council's discretion to set more stringent rules for our local context and environment.</p>
Coastal Policy Statement					
5	Policy 6	Activities in the coastal environment	Clarify	Provide further explanation on the proposed changes to policy 6(1)	Allowing infrastructure that only 'may be required' rather than 'important to' the social, economic and cultural well-being of people and communities seems very broad and could have a significant softening effect on outcomes.
National Policy Statement – Highly Productive Land					
6	General comments	Council is supportive, in-principle, of the intention to remove LUC3 from the definition of Highly Productive Land. However, as we have not seen the criteria for what constitutes a 'Special Agricultural Area', we are not able to fully assess the impact of the proposals on the Christchurch District. We also reiterate the importance of finding the right balance between enabling growth whilst ensuring that there is sufficient productive land both in Christchurch and New Zealand.			

		<p>We do not support the proposal to extend the timeframes for mapping of Highly Productive Land (HPL) or suspend requirements until further direction is provided on the upcoming replacement RMA legislation.</p> <p>We note that there is the option of mapping HPL through more detailed mapping including more detailed analysis of LUC units, having regard to limitations of different land Use Capabilities under the classification system.</p>			
7	Clause 3.4 implementation timeframes	Implementation	Reject and retain status quo	Do not extend timeframes or suspend mapping requirements until further direction is provided in the upcoming replacement RMA legislation.	<p>We request that the inclusion of the mapping into the Canterbury Regional Policy Statement progresses as per the original timeframes.</p> <p>Ongoing reliance on the transitional HPL classifications creates challenges, especially where it fails to account for local anomalies. While the removal of LUC 3 land may provide benefits in other areas, in the Christchurch context, there would be greater benefits in the mapping requirements being advanced through a statutory process by Environment Canterbury.</p>

Stock Exclusion Regulations		
8	General comments	<p>We do not support this change.</p> <p>In the Christchurch District, the percentage of remaining natural wetlands in the Plains is significantly less than 10% (average across New Zealand). Any increased pressure or potential impact on these areas would be significant. Even light grazing from stock may cause long term hydrology, weed infestation and sedimentation issues in a vulnerable wetland and will impact the long-term viability of these sites.</p> <p>The problem that this proposal is addressing is primarily found in the South Island High Country. We consider that the proposed changes, which are meant to apply generally across the country, are unnecessary and will potentially create more environmental impact on wetlands on a national scale than it solves within the target area.</p> <p>We note that Environment Canterbury has criteria for when non-intensively farmed stock can access a lake, river or wetland. If this amendment progresses, a definition of 'low intensity grazing' is needed to provide certainty and clarity to both grazers and regulators.</p>
Quarrying and Mining (NPS-IB, NPS-HPL, NPS-FM and NES-F)		
9	General comments	<p>While we are not opposed to mining and quarrying activities, we are concerned about the proposed amendments, as it will lead to worse ecological impacts. The introduction of the operational requirement test would give significant leeway for these activities, given that they must be located where the relevant minerals are.</p> <p>While the more stringent tests in clause 3.11 of the NPS-IB would be removed, we note that we would still have the effects management hierarchy under the NPS-IB and the Christchurch District Plan. However, this would lead to greater adverse ecological impacts as the effects management hierarchy is a lesser test than the current test in clause 3.10(2).</p>