SUBMISSION ON THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991

To: Environment Canterbury
    PO Box 345
    Christchurch

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TRADE COMPETITION

I could not gain an advantage in trade competition through this submission.

SIGNATURE:  DATE: 4 OCT 2012

I would not like to be heard in support of its submission.
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
<th>(3) I seek the following decision from Environment Canterbury: <em>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns)</em></th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 4-5</td>
<td>Policy 4.9</td>
<td>Support in full</td>
<td>I support a policy that states there shall be no direct discharges of wastewater to surface waterbodies or groundwater</td>
<td>Adopt this policy as it clearly states the design objective for on-site wastewater systems</td>
</tr>
<tr>
<td>Page 5-3</td>
<td>Rule 5.7</td>
<td>Oppose in full</td>
<td>This rule will require the owners/operators of existing on-site wastewater systems that were lawfully installed but that are not located within the “Septic tank suitability – Area A” planning map to apply for a retrospective resource consent. According to the Section 32 report, this planning map takes into account depth to groundwater, soil type and site slope. However, there are no details on the trigger depth to groundwater, soil type or site slope provided in the Section 32 report. Based on comments in the Section 32 report sites with poorly drained soils are excluded from the “Septic tank suitability – Area A”. My site is not located within the “Septic tank suitability – Area A”.</td>
<td>Delete this rule because there seems to be no benefit to the environment from this rule. This rule will only cost me at least $1,380 (the consent deposit cost) and more likely over $2,500 if I need to pay someone to complete the resource consent application for me.</td>
</tr>
</tbody>
</table>
My on-site wastewater system was installed in **2011**. This disposal system was designed in accordance with the On-site domestic wastewater management standard (AS/NZS 1547: 2000). This standard includes design solutions for poorly drained soils, which are present on my property. The system was granted a certificate of compliance from EC an. The permitted activity rules include conditions, such as no wastewater is to pond on the ground surface. My existing system can meet these requirements and therefore, there would be no benefit to the environment from me having to apply for and pay for a retrospective resource consent.

If the intention of this rule is to capture home owners who illegally modify their failing disposal systems then I do not think the majority of law-abiding homeowners should be financially punished.