SUBMISSION ON THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN

To: Environment Canterbury
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In brief
My reading of this plan: positive parts for Conservation and moderating development. However vested interests hold sway.

With reference to section 2 – how plan works and definitions:
Other regional plans as developed by Zone Committees take precedence over CLWRP. This will end badly! The influence structure as origianaly agreed to in the CWMS has been upended.

There is a big fat underlying assumption (!) in this plan that allowing and indeed promoting irrigation and storage schemes is a large economic benefit to Canterbury. Any reading of the two concrete irrigation scheme proposals for Canterbury; HWP and Trustpower / CPW, shows a likely net economic loss at the farm gate level. Since the CWMS was formulated, understanding of intensified agriculture in an economic sense has progressed to where intensification appears as a net loss to 'NZ inc'.

I support the use of Lake Zones to further the control of poor farming practice.
I support the attempt to rein in poor farm practice and nutrient application, but I hope it does not prove to little, to late.
I applaud the inclusion of a prohibition on damming of the Clarence river. It has the highest value as a wilderness experience.

In particular
4.42: Any alteration to the level of any natural lake that is unmodified as at 11 August 2012 is within its natural range (averaged over not less than five years).
This is an inadequate protection for lakes with intact natural hydrology, eg. Lake Sumner.
While Canterbury lakes may exhibit considerable natural range, it is the duration of highs and lows which can wreck the most fundamental damage. For instance, Lake Sumner has not reached the design height of HWP's scheme since 2002 but then it was only for a few hours, not months as proposed for storage. This is where the real damage to landscape and ecology will occur.

Suggest addition to wording;.... *Any alteration to the level of any natural lake that is unmodified as at 11 August 2012 is within its natural range and duration* (averaged over not less than five years).

Sub regional sections – 6: High Naturalness Water Bodies.
Lake Sumner has proven to meet all the criteria as derserving of the highest protection offered under this plan. **It is being excluded to pander to vested interests.** This plan risks loosing its legitamacy if it does not acknowledge the outcomes from the old NRRP, the WCO recommended for the North Branch and current public sentiment. Lake Sumners' exclusion from the group of High Naturalness Water Bodies is a glaring anomaly.

Thank you for the opportunity to make a submission. **I wish to be heard in support of it.**

Edward Snowdon
4/10/12

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