

19 pages

Submission on Proposed Canterbury Land and Water Regional Plan

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EC148741

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:

Freeport 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

0253

Full Name: Pam Richardson **Phone (Hm):** 03 304 6825

Organisation*: **Phone (Wk):** n/a

* the organisation that this submission is made on behalf of

Postal Address: CMB 24 Pigeon Bay **Phone (Cell):** 0274 478 551

RDB Akaroa 7583 **Postcode:** 7583

Email: ip.richardson@tra.co.nz **Fax:** n/a

Contact name and postal address for service of person making submission (if different from above):

as above

Trade Competition

Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- ☐ I could not gain an advantage in trade competition through this submission; or
- ☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

- ☐ I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
- ☐ I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature: [Signature] **Date:** 14th October 2012

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

- ☐ I do not wish to be heard in support of my submission; or
- ☒ I do wish to be heard in support of my submission; and if so,
- ☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

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Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
The whole plan General comments		-	Concern at the speed in which this plan has been implemented. The issues are not always explained fully. For many landowners they will not have any idea of the issues and there has been no working through/workshops with the community.	
		-	The Zone Committees may be informed but the pressures applied by the process has not allowed opportunities to inform and debate many of the issues with a wider group of landusers.	
		-	The organisation is working in isolation	

Add further pages as required – please initial any additional pages.

RJR

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The whole plan			and achieving the outcomes that could be expected will not be achieved.	
General comments.		-	The plan appears to be focused on rural land and little attention to urban issues.	
		-	Little evidence shown of the costs to landowners in the implementation of what appears to be a resource consent process for farming.	
		-	No evidence given of the next steps and the education/information communication required to achieve the results outlined	

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1 4	Biodiversity Wetland Riparian Management.		For Banks Peninsula the trend is an improving situation. There are many areas where revegetation projects underway. Tawhara Valley Stream project. Koutukouata. Holmes Bay etc.	Some recognition that improvements are occurring that second growth is occurring and revegetation project completed and others underway. Let's celebrate success!
1 - 12	Key Approaches.		Indicators of Regional Economies are important. The "bureaucracy" associated with this plan could stifle Canterbury's vibrancy. For Banks Peninsula sustain able land use important and today's land use similar to 1900's.	Sub Regional Plan to address.

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Section & Page Number	Sub-section/Point	Oppose/support (in part or full)	Reasons	
2-13	Sig. Indig Biodiversity Definition		<p>This definition is important and the info regarding this should be included in the Plan. There should be a 'one stop shop' and no need to go to another plan.</p> <p>The sites should be identified in the plan to give certainty to landowners. Ecologists need to agree to use of definition. There seems to be so many different interpretations. A definition for sensitive sites would all they. Once ago certainty for landowners.</p>	<p>Include Appendix 4 as a schedule item</p> <p>Identified significant sites provided in the plan</p> <p>Definition in the plan for sensitive sites</p>
2-13	Sensitive sites.			

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PK

APPENDIX 4

CRITERIA FOR DETERMINING SIGNIFICANT INDIGENOUS VEGETATION AND SIGNIFICANT HABITAT OF INDIGENOUS BIODIVERSITY

Schedule .
Item .

Representativeness

1. Indigenous vegetation or habitat of indigenous fauna that is representative, typical or characteristic of the natural diversity of the relevant ecological district.
2. Indigenous vegetation or habitat of indigenous fauna that is a relatively large example of its type within the relevant ecological district.
3. Indigenous vegetation or habitat of indigenous fauna that is degraded but retains key natural ecosystem functions (for example hydrology or soil formation processes).

Rarity/Distinctiveness

4. Indigenous vegetation or habitat of indigenous fauna that has been reduced to less than 20% of its former extent in the Region, or relevant land environment, ecological district, or freshwater environment.
5. Indigenous vegetation or habitat of indigenous fauna that supports an indigenous species that is threatened, at risk, or uncommon, nationally or within the relevant ecological district.
6. The site contains indigenous vegetation or an indigenous species at its distribution limit within Canterbury Region or nationally.
7. Indigenous vegetation or an association of indigenous species that is distinctive, of restricted occurrence, occurs within an originally rare ecosystem, or has developed as a result of an unusual environmental factor or combinations of factors.

Diversity and Pattern

8. Indigenous vegetation or habitat of indigenous fauna that contains a high diversity of indigenous ecosystem or habitat types, indigenous species, or genotypes, or has changes in species composition reflecting the existence of diverse natural features or ecological gradients.

Naturalness

9. Indigenous vegetation that is in a relatively intact state for the relevant ecological district, i.e. has relatively little human modification.

Ecological Context

10. Vegetation or habitat of indigenous fauna that provides or contributes to an important ecological linkage or network, or provides an important buffering function.
11. A wetland which plays an important hydrological, biological or ecological role in the natural functioning of a river or coastal system.
12. Indigenous vegetation or habitat of indigenous fauna that provides important habitat (including refuges from predation, or key habitat for feeding, breeding, or resting) for indigenous species, either seasonally or permanently.

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Section & Page Number	Sub-section/Point	Oppose/support (in part or full)	Reasons	
3-2			Lack of acknowledgement that the community has a major role to play and that there should be an objective to ensure the community working together identifying resolving issues. A true partnership.	An objective to ensure community involvement collaboration to resolve the issues
			There needs to be an acknowledgement of low impact farming and that this also needs to be a viable operation. The document appears to be focused on intensive agriculture and "big infrastructure" Banks Peninsula totally different	Banks Peninsula Zone totally different and will have a different focus to other zones. The importance of catchment planning

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Section & Page Number	Sub-section/ Point	Oppose/support (in part or fully)	Reasons	
5-9	5.29.		<p>The statement does not make it clear that this is the standard for all offfall / rubbish pits or just those where contaminant may enter water.</p> <p>Offal and Farm Pits vital facilities especially when there are no alternatives</p> <p>The alternatives have to be viable / economic options in "relatively isolated" rural communities.</p> <p>Have to meet other Health related standards Meat industry standards etc.</p> <p>If Banks Peninsula not suitable for pits. What alternatives are there.</p>	<p>These are the standards for all pits including where contaminant may enter water.</p> <p>Banks Peninsula Sub regional Section to address.</p>

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Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
513	5.4b3.		<p>The OVERSEER TM nutrient model has not been designed for extensive pastoral use.</p> <p>Our stocking rate average is 6-7 su per hectare. With a 20-30% margin of error at this stage how can this provide any real firm evidence of causing a problem.</p> <p>Will overseer include nitrogen from other sources gose, tree lucerne etc.</p> <p>Banks Peninsula stream show lower levels of nitrogen in the water.</p> <p>Trends over time need to be measured and at present the tools are not helpful for use on Banks Peninsula</p>	<p>If overseer not appropriate tool could the nitrogen levels in streams be monitored</p> <p>Subregional Plan to address.</p>

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10

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5 13.	5.46 2.	Annual loss of nitrogen	<p>If these figures annual loss of nitrogen are worked through with the Zones & Sub Regional Plans.</p> <p>Majority of our Banks Peninsula landowners will not be familiar with this process at all.</p> <p>If you understand the issues management can be followed to address some areas no fertilizer application</p> <p>Fertilizer application is low on Banks Peninsula does that mean that for Banks Peninsula it is a non complying activity because no blanket farming activity specified</p>	<p>Nitrogen losses to be worked through with the landowners ^{landowners} involved in the zone</p> <p>An alternative way of looking at losses to be investigated.</p> <p>Regional Plan Zone will address the role if appropriate.</p>
5 B	5.49			

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5-14	5 52. Fertiliser use.	identified Significant indigenous biodiversity site.	These areas must be identified in a plan. There appears to be a lack of a consensus by ecologists as to what is a significant indigenous biodiversity site landowners need certainty.	Should this be a Sub Regional Plan issue.
			It may be that tussockland on Banks Peninsula may also be identified as Significant.	Significant areas should be identified to provide certainty for landowners.
			Tussock grassland is grazed by stock and at times needs to be fertilized as part of good land management.	Not all significant sites should be excluded from fertilizer application eg tussock grassland, connecting corridors

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5-21	5.88	operative	There may be a number of small supplies in Banks Peninsula. The definition for the Strategy gives little guidance.	A further guidance as to what should be included in the small community water supply strategies.
		Water Supply Strategy	The water supplies in many situations "very old" systems and based on good will.	Banks Peninsula Sub Regional Plan matter to be addressed.
5-34	5.150	Permitted activity provided.	It is not clear if fencing is still allowed in the Ltt 2 identified areas. Benching of fence line is an important step in installing sound fencing fences.	Fencing, benching of fence line, removal of indigenous vegetation in some situations important part of land management. Fencing a management tool. eg prevents stock camps

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5-34	5.150 Identification of UH2		<p>These are areas more prone to slippage on the property than others. The property has a land inventory A soil and Conservation Plan No 395 identifies areas — soil type slope erosion vegetation land capability classification has also been identified.</p> <p>Some of these areas do not align with the identification of UH2 land.</p>	<p>To have further discussion with the Banks Peninsula Community. How this land has been identified</p> <p>Banks Peninsula Sub Regional Plan to address identification of erosion prone land and limitations of use.</p>

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5-34	5.150 3		<p>This statement reflects a lack of understanding of what happens in the Banks Peninsula environment. There are very few channels and existing watercourses in the rural setting. Storm water control is via a channel into the road reserve and private land receives the storm water. The grasslands and vegetation acts as a swale.</p> <p>The costs to install culverts and storm water controls is not always viable or economic in the rural environment of Banks Peninsula - an unrealistic expectation</p>	<p>culverts and storm water controls are installed where appropriate.</p> <p>Sub Regional Plan to resolve.</p>

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16-13	Schedule 7 Farm Environment Plan		<p>Professionals being required to write Farm Plans.</p> <p>As a landowner very familiar with our property we have the ability to prepare our plan for our Banks Peninsula Property.</p> <p>Over the years we have a considerable no of reports - a soil and conservation plan. An ecological report on the property.</p> <p>I have undertaken courses including the Natural Step Introduction and continue to involved in</p>	<p>Acknowledgement and the opportunity for the landowner to compile the farm plan with the support/input of professionals if necessary.</p> <p>eg. Overseas Programme Fertilizer Company</p> <p>• Ecologist for report on indigenous biodiversity.</p>

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5-3	5.7		meeting the conditions set in this rule means that every dwelling with a septic tank will have to review their systems on Banks Peninsula. It is not clear for areas outside the Septic Tank Suitability Area & the Planning Maps what will be suitable for Banks Peninsula. What are the guidelines. It appears as though the cheapest will be for the many to return to pit-toilets. Where is the information to suggest it is such an issue for Banks Peninsula. Are there human health issues	<p>Suitably maintained old systems causing no problems to anyone surely should be able to be continued.</p> <p>Sub Regional Plan to address water and come up with alternatives for Banks Peninsula.</p>
	On site waste water including Septic tanks			

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5-3	5.7		Continued	
			If a contaminant is not going to enter water and there is no human health animal health issues. Could the old systems not be continued.	
			Replacement of Septic tank systems (one of considerable cost. An expense used by individuals and not as part of CCC schemes or private group schemes.	
			The use of language in this rule should talk about Septic Tanks. Community may not know what the rules are about.	Waste water definition necessary Include Septic Tank in the definition and the introduction to 5.7 rules.

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P.O. Box 345.

Christchurch 8140

Pam Richards

CMB 27 Pigeon Bay

RD 3

Akaroa 7583