

Steph Bennett

From: adamel <adamel@maxnet.co.nz>
Sent: Friday, 5 October 2012 2:02 p.m.
To: mailroom@ecan
Cc: Pete Morrison
Subject: pLWRP submission
Attachments: P&E submission.doc; Sheffield water users group submission.doc

Categories: Purple Category

EC165538=Peter Morrison

EC309792=Sheffield Water Users Group

EC132306= P & E Ltd



Sub ID 391

SUBMITTER ID: 0227

Hi, Please forward the attached submissions onto the pLWRP team.

Thanks

Warwick Pascoe

On behalf of the Sheffield Water Users Group & P&E Ltd



FOR OFFICE USE ONLY

Submitter ID:

File No:

Submission on Proposed Canterbury Land and Water Regional Plan

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:

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

Full Name: _____ **Phone (Hm):** _____

Organisation*: Sheffield Water Users Group, c/- Mr Pete Morrison _____ **Phone (Wk):** _____
* the organisation that this submission is made on behalf of

Postal Address: 530 Deans Road, RD 1, DARFIELD **Phone (Cell):** (021) 828-605

_____ **Postcode:** 7571 _____

Email: petem.liz@xtra.co.nz _____ **Fax:** _____

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

Trade Competition

Pursuant to 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
- I am not directly affected by an effect of the subject matter of the submission

Signature:



pp Pete Morrison

Date: 5 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.

- | | |
|-------------------------------------|---|
| <input type="checkbox"/> | I <u>do not</u> wish to be heard in support of my submission; or |
| <input checked="" type="checkbox"/> | I <u>do</u> wish to be heard in support of my submission; and if so, |
| <input checked="" type="checkbox"/> | I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing |

We adopt the portion of the submission by the Primary Industries Sector Group (Federated Farmers, DairyNZ etc), including the reasons and relief sought (including the evidence of Ms Shirley Hayward), in relation to the objectives, policies and rules of the proposed Land & Water Regional Plan dealing with the impact of farming activities on water quality.

In addition, we make the following specific submission point set out below.

NB: Where there is any difference between our specific point below, and the submission made by the Primary Industries Sector Group submission, the former over-rides the latter.

(1) The specific provisions of the Proposed Plan that my submission relates to are:	Section & Page Number	Sub-section/Point	Reasons	(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)	(3) I seek the following decisions from Environment Canterbury. (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.)
Volume 1, Section 4, Policy 4.1 (page 4-1), Table 1c (page 4-4), Policies 4.31 (page 4-7) & 4.34 (page 4-9), and the "Nutrient Allocation Zones" map (page 4-8); and	Volume 1, Section 4, Policy 4.1 (page 4-1), Table 1c (page 4-4), Policies 4.31 (page 4-7) & 4.34 (page 4-9), and the "Nutrient Allocation Zones" map (page 4-8); and	Oppose	We oppose the classification of areas of Canterbury as 'red' on the Planning Maps (i.e. "water quality outcomes not met") as the s32 analysis (specifically Appendices 1 & 6) provides insufficient technical information to afford any confidence that water quality outcomes are not actually being met throughout the whole of the nutrient zone. Given this lack, it is therefore totally inappropriate to classify any farming activities as "non-complying" under Rules 5.44 and 5.49 (especially as an interim approach prior to decisions being made on a zone-by-zone basis through the CWMS process), as this sets too high a threshold for consent applications to be granted. An example of a limitation of the process by which the nutrient zones have been delineated can readily be found in the Selwyn-Waihora Zone, where areas that drain towards the Waimakariri River (e.g. around Sheffield – refer to the evidence of Mr Julian Weir of Aqualinc given at the CPW consent hearing), have been classified in the same way as intensively farmed land immediately adjoining Lake Ellesmere / Te Waihora.	Oppose	Classify all 'red' nutrient zones as 'at risk' as the default position, until sufficient technical information has been provided through the CWMS process to justify a 'water quality outcomes not met' classification. Make the default classification for consent applications for 'farming activities' in 'red' nutrient zones 'discretionary,' to allow every application to be judged on it's technical merits, as is the case for such applications in 'orange' nutrient zones, without having to argue that "exceptional circumstances" apply before it can be granted.
Volume 1, Section 5, Rules 5.44 and 5.49 (page 5-13); and	Volume 1, Section 5, Rules 5.44 and 5.49 (page 5-13); and	Oppose	While we appreciate that this kind of zonal scale "catch-all" planning approach has doubtless been necessitated by the very limited timeframe for preparing this plan, this has the potential to significantly impact both existing and proposed farming activities, many of which will arguably have no		
Volume 2 – Map	Volume 2 – Map				

			significant impact on groundwater quality either locally, or across the nutrient zone as a whole.	

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