

From: [Chris Hansen](#)
To: [Sarah Drummond](#)
Cc: [Shaun Burkett](#); [Richard Christie](#)
Subject: Proposed Canterbury Land & Water Plan - response to the Commissioners' questions - Ravensdown
Date: Monday, 17 June 2013 2:25:37 p.m.

Hi Sarah

I was asked by John Glennie to respond to you on the following question from the Commissioners:

Rule 5.7 S42A R2.10.126 page 138	Chris Hansen	Para 34	Rob: asked them to consider whether the s42A amended definition of "on site waste water treatment ' satisfies Ravensdown's concerns. The word "domestic" would not be added. If not satisfied with s42A, what further tweaks would they make.	Ravensdown 265	No Email sent + phone message
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As requested, on behalf of Ravensdown I have assessed the definition of "*on site waste water treatment*" as amended by the s.42A Report, with the understanding that the term '*domestic*' was not to be included. While the amended definition is acceptable to Ravensdown (with the exclusion of the term '*domestic*'), this amendment on its own does not resolve the issue that the term '*domestic*' has been recommended to be added to Rule 5.7. Ravensdown therefore requests that the Commissioner's suggestion that the term '*domestic*' not be included in the definition of "*on site waste water treatment*" be extended to include Rule 5.7. This would resolve Ravensdown's concerns on that matter.

Notwithstanding the above, Ravensdown also opposed the addition of the new permitted activity standard (6) (h) to Rule 5.7, for reasons also put forward by the Fertiliser Association of New Zealand in its submission/planning evidence in relation to Rule 5.72 which includes the same condition. These reasons include:

- It is unclear how the rule would apply to Ravensdown's existing infrastructure, most of which has been developed and embedded in the environment for many years;
- The rule is ambiguous as to the specific effect that clause is seeking to address;
- The rule does not acknowledge existing infrastructure, or seek to exclude it from the rule - this leads to a natural expectation that the rule applies to existing infrastructure;
- This outcome has the potential to place an unnecessary and

unjustified consenting burden on existing discharges points.

Ravensdown reiterates it wishes to have this new permitted activity standard also deleted from Rule 5.7."

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