



# Submission on Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

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FILE REF: PLAN/USEL/IP/BSU/2  
44717

25 MAR 2014  
S. Hammond

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Submitter ID:

File No:

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 21 March 2014 to:

Freepost 1201 Variation 1 to pLWRP  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: Hugh James Macartney Phone (Hm): 033296.734

Organisation\*: as Chairman of Phone (Wk): \_\_\_\_\_  
\* the organisation that this submission is made on behalf of

Postal Address: Halswell Drainage District Phone (Cell): 027 2260466  
Wastion Committee Postcode: 7672

Email: J.J. Mac. Roseville@xtra.CO.NZ Fax: \_\_\_\_\_

Contact name and postal address for service of person making submission (if different from above):  
c/- H J Macartney  
NO 2 RD CHCH 7672

**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: HJ Macartney pp HND LC Date: 19/3/14

(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,

I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

Submission as per attached.

## **KEY SUBMISSION POINTS**

### **Section 3, page 3-1, Policy 9.4.9 (land inundation).** Position: support in part.

Reason: Any increase in water table level, drainage base flows, flood inundation, or lengthening of flood drainage times, in the Halswell River catchment is of great concern to the rating district. The policy should also consider the discharge of groundwater to surface water, we seek an amendment to include this issue.

### **Section 4, page 4-9, Policy 11.4.34 (land inundation).** Position: support in part.

Reason: Any increase in water table level, drainage base flows, flood inundation, or lengthening of flood drainage times, in the Halswell River catchment is of great concern to the rating district. The policy should also consider the discharge of groundwater to surface water, we seek an amendment to include this issue.

### **Section 4, page 4-14, Rule 11.5.21 (drainage water).** Position: oppose.

Reason: five of our scheme drains are within the defined Lake Area and connect to the Halswell River. These drains are integral to the lower scheme and their ongoing functionality is vital to the community. We seek the new requirement for consent for these drains is removed. If Environment Canterbury does not agree and imposes that a requirement to obtain resource consent for these existing activities, then we seek the activity status as a 'controlled activity' as they are consents that have to be granted – they cannot be declined. We also seek that these types of activities are exempt from public notification.

### **Section 4, page 4-16, Rule 11.5.29 (stormwater).** Position: oppose in current form.

Reason: the discharge of stormwater is an ongoing issue for the Halswell catchment particularly in regard to increase in base flood flows and cumulative effects of new development. The rule has a focus on contaminants and we would like to see it address issues of land inundation, or lengthening of flood drainage times, as highlighted in Policy 11.4.34. For the lower Halswell catchment, a major concern is the cumulative effect on quantity (flow, level, volume) of multiple stormwater discharges, particularly during long duration storm events. The June 2013 flood was a good example of a sustained rainfall event causing significant flooding and extended durations of limited drainage in parts of the Halswell catchment. Drainage was also limited in other events such as in August 2012, October 2011. A key issue is that the definition of stormwater excludes groundwater whereas stormwater management plans also need to manage the effects of groundwater. The key pLWRP policy 4.17 for stormwater systems simply states: "Stormwater runoff volumes and peak flows are managed so that they do not cause or exacerbate the risk of inundation, erosion or damage to property or infrastructure downstream or risks to human safety". For the Halswell catchment in particular, it is also necessary to manage discharge of groundwater, particularly where new developments change existing flow patterns. If Option 3 is to be used, it would be necessary to state that stormwater management plans for the Halswell catchment also need to include any changes to groundwater flows. The equivalent NRRP policy (4.7.3.2) included specific details on what should be in a stormwater management plan. We seek that requirements of what should be in a stormwater management plan, including ongoing monitoring and the ability to review, be detailed within Variation 1.

Free post 1201 Variation 1 to PLWAP

Environment Canterbury

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