

## Make Submission

<b>Consultee</b>	Dr David Whale (52134)
<b>Email Address</b>	dmwhale@gmail.com
<b>Address</b>	175 Seabridge Road Christchurch 7672
<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Dr David Whale
<b>Submission ID</b>	V1pLWRP-28
<b>Response Date</b>	19/03/14 2:48 PM
<b>Consultation Point</b>	7. MANDATORY INFORMATION - HAVE YOUR SAY ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>To Be Heard</b>	
<b>Please select the appropriate option from the following:</b>	I DO NOT wish to be heard in support of my submission; or
<b>If so</b>	

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<b>Event Name</b>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Dr David Whale
<b>Submission ID</b>	V1pLWRP-24
<b>Response Date</b>	18/03/14 10:41 PM
<b>Consultation Point</b>	11.5.2 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

This suggests that any new development/building will require resource consent where, as it inevitably will, require on-site water treatment.

An extra cost for what gain? In the outer plains minimum section size is 20H so seems a superfluous requirement.

I note in rule 5.7 a 1m separation between disposal point and ground waterlevel. This is going to be challenging as Central Plains Scheme will raise groundwater levels and restrict lawful use of the land without compensation.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

Outer plains has a 20H minimum section size. Requiring a resource consent for on-site water treatment imposes additional costs for no perceived benefit.

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<b>Submission by</b>	Dr David Whale
<b>Submission ID</b>	V1pLWRP-25
<b>Response Date</b>	18/03/14 10:45 PM
<b>Consultation Point</b>	Offal and Farm Rubbish Pits ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

How, by whom and with what qualifications will any sensible, practical and robust approach to establishing impact be achievable? Seems one could be held hostage to an ambiguous set of value judgements.

Comment applies throughtout the landscape area.

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**I seek the following decisions from Environment Canterbury:**

Clear articulation on how any objective impact assessments can be made and how decisions may be challenged.

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<b>Submission by</b>	Dr David Whale
<b>Submission ID</b>	V1pLWRP-61
<b>Response Date</b>	21/03/14 9:17 AM
<b>Consultation Point</b>	11.5.29 Paragraph ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

### **My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

I have a network of ditches that discharge into a single drain that runs under Seabridge Road and into a corresponding network on adjacent land and thus to the lake. These ditches are intended to take some of the surface water from the paddocks. Whilst this does happen the ditches usually fill as a consequence of the movement of water from the Port Hills to the lake. Usually a week or two after rain in the hills, and assuming the ground is already saturated, then, with no further rain, the ditches will simply fill with water and overflow onto certain paddocks. This water will remain until the lake level drops sufficiently to drain the land. Given this scenario:

- 1 do all of these small scale (<1m wide and deep) drains need to be fenced? If so this would entail fencing some 2Km on my 20H. Simply unaffordable especially when I keep very low numbers of stock.
- 2 the majority of the drainage water from my property is 'inherited' from upstream flows. How are flood prone areas to be treated? Often times low lying paddocks around the lake will have stagnant water lying on them over winter. When the lake level drops the water moves into the ditches and the anaerobic 'plug' decimates aquatic life. There is nothing the farmers can do to prevent this. In this area the restoration of the Ahuriri lagoon to what it once was (~1m deeper) would significantly mitigate this effect locally.
- 3 how do I determine the recognised extent of the drainage system as at 2004? Why 2004? At that time what constituted a drain?

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

- 1 Low stock density and small scale drains require no fencing.
- 2 Current drainage systems may be retained and maintained.
- 3 Recognition that in flood prone areas nutrient management is on the basis of 'best endeavour' as there is no ability to control incoming flows.
- 4 Recognition that reclaimed land around the lake will have potentially high nutrient levels - particularly common salt. Drainage water from that land will therefore be high in those materials even when there is no additional nutrient applied to the land. Are low lying paddocks are around 2-2500ppm NaCl.