

Make Submission

Consultee	Mr Grant Bonniface (52155)
Email Address	bonniface4@xtra.co.nz
Address	92a Bryndwr Rd Christchurch 8052
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-49
Response Date	20/03/14 10:02 PM
Consultation Point	Mandatory Information - Have Your Say (View)
Status	Submitted
Submission Type	Web
Version	0.1

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

To Be Heard

Please select the appropriate option from the following: I DO NOT wish to be heard in support of my submission; or

If so

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Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-44
Response Date	20/03/14 9:53 PM
Consultation Point	11.4.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	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 believe that the proposed timeframe is too short to achieve a satisfactory plan, given that:

1. There are limited numbers of people qualified to create these plans. Constraint in terms of production of the plan and the price that will be charged for carrying out this work. Low supply, high price.
2. Limited numbers of qualified people mean that the potential for poor plans is heightened. These plans have the potential for very significant economic impacts on farms and therefore must be got right and be consistent between farms. The requirements for the plans has been introduced a short notice and by the time the consultation process is worked through will be even shorter timeframe. Farmers budgets do not contain near term allowances for significant expenditure on these plans.
3. There is not enough understanding within the community (effected parties) of how these plans are constructed , the variables and outcomes and impacts.
4. They use Overseer as a component as I understand it, which while a tool, has a high degree of variability and therefore may not give an accurate outcome in what is a very critical key calculation.
5. How will the models deal with imported nitrogen in groundwater that is then irrigated particularly for those farmers in the lower end of the catchment. The impacts of CPW and its nitrogen impact on groundwater are unknown and must be able to be taken into account as a "credit" when looking at the

leaching from a farm. Farm practices may achieve the result but imported nitrogen loaded water may impact the actual output.

6. What is 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:

Item a given notes above

Item c given the notes above.

The plan requirements need to be extended out to allow the creation of a proper plan that is understood by all concerned. suggestion is that all plans have the same deadline as it must be remembered that any approach within the catchment must be an integrated one and occur concurrently.

NB: Editing these submissions is very difficult as the detail of the change does not appear at the edit

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Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-45
Response Date	20/03/14 9:54 PM
Consultation Point	11.4.23 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	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 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:

Irrigation while a function of intensity of farming is also a function of weather patterns and the capability of the farmer to manage usage. The calculation for demonstrated use needs to be carried out carefully to allow for spikes in requirement due to severe draught conditions that may not be evident in short term usage analysis.

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Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-46
Response Date	20/03/14 9:55 PM
Consultation Point	11.4.18 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

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

My submission is that: Support

Please state your reasons for supporting/opposing/amendments sought

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

I am very doubtfull that this can be achieved particularly with sediment. There is a real nievity about the ability to arrest the effects oflake edge erosion and therefore protect wetlands.On our farm weclosed off approximately 150acres to animal grazing in 2001. We have carried out planting but despite the efforts lake erosion has increased significantly. The more erosion, the greater the open water area, the greater the wave action from the wind andthe greater the erosion. This has the effects of increasing sediment in the lake. The eroded lake edge increases in height the more the eroded it becomes and short of a bank there is no way to arrest this process. Plants will not grow in the mud created.

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:

Does Ecan actually understand that for the most part lake edge restoration of wetlands is not practicle?

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Address	92a Bryndwr Rd Christchurch 8052
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-47
Response Date	20/03/14 9:58 PM
Consultation Point	11.4.18 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

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

My submission is that: Support

Please state your reasons for supporting/opposing/amendments sought

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

I am very doubtfull that this can be achieved particularly with sediment. There is a real nievity about the ability to arrest the effects of lake edge erosion and therefore protect wetlands. On our farm weclosed off approximately 150acres to animal grazing in 2001. We have carried out planting but despite the efforts lake erosion (and therefore sediment) has increased significantly. The more erosion, the greater the open water area, the greater the wave action from the wind and the greater the erosion. This has the effects of increasing sediment in the lake. The eroded lake edge increases in height the more eroded it becomes and short of a bank there is no way to arrest this process. Plants will not grow in the mud created.

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:

Does Ecan actually understand that for the most part lake edge restoration of wetlands is not practicle?

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Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-48
Response Date	20/03/14 9:59 PM
Consultation Point	Table 11(n): Cultural Landscape/Values Management Area (View)
Status	Submitted
Submission Type	Web
Version	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:

We have riparian rights on our property on the LII river. It is our view that a 20m strip is excessive and should be reduced to 10m strip assuming thatv restrictions apply to the application of fertiliser . It is the view of the writer that the Te Waihora Cultural Landscape/Values Lake Management Area is not appropriate nor properly mapped. The entire zone should be dealt with in the same way on the same basis and to the same timetable. To be putting in place a set of rules that apply to the cultural zone when importation of nitrogen/phosphorus is occurring through the water being carried into that zone by waterways and subteranian water from outside is not logical.

It also important to note as explained in a previous comment that there is significant erosion on the lake edge which will not be able to be arrested by riparian planting and therefore will continue to impact on the water clarity of the lake on an ongoing basis.

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:

What is the science behind a 20m strip that would have any different effect to a 10m strip.

Please explain the logic behind the Te Waihora Cultural Landscape/Values Lake Management Area and the logic behind the boundaries. The boundaries place some arbitrary line around the lake which water, nitrogen, phosphorous and to a lesser extent sediment pass and flow through from outside the cultural zone particularly through rivers, drains, and also shallow aquifers which surface in springs inside the cultural zone.

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Submission by	Mr Grant Bonniface
Submission ID	V1pLWRP-50
Response Date	20/03/14 10:02 PM
Consultation Point	11.5.7 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	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:

Don't believe that the timeframe in the cultural zone is realistic nor the requirements easily understood. As mentioned elsewhere:

1. There needs to be significant education and understanding given to affected parties before implementation
2. The cost is unbudgeted and likely to be significant.
3. There are limited numbers of people capable of preparing plans
4. As I understand it "overseer which is integral in the plan process is inaccurate and inconsistent.
5. There is very likely changes in the way that farming needs to be carried out. It is important that farmers are able to financially manage their way through these changes in a way that is financially sustainable. Farmers with healthy incomes are able to carry out and provide for more mitigation measures.

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:

That ECAN treat everybody within the wider zone in the same way under the same process and that the notion of Cultural Zone be removed as it is a whole of catchment approach that is required.

That the time frames be the same for all farmers in the zone and that they are reviewed to provide a financially sustainable and acceptable path through to the targets.

That an education programme related specifically to farmers be put in place and funded by ECAN.