

Submitter ID:

File No:

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

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991

Return your signed further submission by **5.00pm Monday 9 June 2014** to:

Freeport 1201 Variation 1 to the Proposed Canterbury Land and Water Regional Plan  
Environment Canterbury  
P O Box 345  
Christchurch 8140

<b>Full Name:</b> Ellesmere Irrigation Society Incorporated _____	<b>Phone (Hm):</b> 3243429 _____
<b>Organisation*:</b> Ellesmere Irrigation Society Incorporated _____ <small>* the organisation that this further submission is made on behalf of</small>	<b>Phone (Wk):</b> 3243429 _____
<b>Postal Address:</b> c/- C M Barnett, Lakeside, R D 3, Leeston _____	<b>Phone (Cell):</b> 0274888055 _____
_____	<b>Postcode:</b> 7683 _____
<b>Email:</b> carey.barnett@xtra.co.nz _____	<b>Fax:</b> N/A _____
<b>Contact name and postal address for service of person making further submission</b> (if different from above): _____ _____	

**Only certain people can make further submissions. Please tick the option that applies to you:**

I am a person representing a relevant aspect of the public interest; or

I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or

I am the local authority for the relevant area.

I do not wish to be heard in support of my further submission; or

I do wish to be heard in support of my further submission; and if so,

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

**Service of your further submission:**  
Please note: any person making a further submission must **serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury**. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

**Signature:** \_\_\_\_\_ **Date:** 6 June 2014 \_\_\_\_\_

(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.

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(4) Support or oppose
<i>Name &amp; postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Note support or oppose</i>
<b>Selwyn District Council</b> Mr Murray England PO Box 90 Rolleston 7643	V1pLWRP - 513	The Ellesmere Irrigation Society Inc (hereafter referred to as 'the Society') considers this paragraph as a valuable insertion into the Variation and fully recognises all the values of the subject area.	Support
<b>North Canterbury Province of Federated Farmers NZ Inc;</b> Mr Michael Bennett PO Box 20448 Bishopdale Christchurch 8543	V1pLWRP – 846	The Society considers the wording of these submission points as being a valuable insertion into the Variation and fully recognises all the values of the subject area.	Support
<b>Horticulture New Zealand</b> Mr Chris Keenan PO Box 10-232 Wellington 6143	V1pLWRP – 1383		Support
<b>Dairy NZ</b> Mr James Ryan PO Box 85006 Lincoln University Lincoln 7647	V1pLWRP – 1343		Support
<b>Fonterra Co-operative Group Limited</b> Ms Sue Ruston PO Box 417 Wellington 6140	V1pLWRP - 1213		Support

<b>Te Taumutu Rūnanga</b> Ms Julie Robilliard PO Box 3214 Christchurch 8140	V1pLWRP - 292	The Society considers the proposed measures to be inappropriate given that a review of groundwater take consents in the Irwell area has just recently been undertaken and has imposed excessive restrictions on water users in this area. To undertake this process again would not return water to the Irwell River. This River's changes in levels directly relate to the flows in the Selwyn River and the cumulative and upstream impacts on that system.	Oppose
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b> Mr James Caygill PO Box 13 046 Christchurch 814	V1pLWRP - 370	The Society opposes these proposed amendments in their entirety. The proposed amendments serve to overburden domestic and farming operations in trying to meet extensive regulation in the Cultural Landscapes/Management Values Lake Area. The requests made in this proposed amendment are not realistic and would not result in the retention of adequate social and economic wellbeing.	Oppose
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b>	V1pLWRP - 401	The Society opposes these proposed amendments in their entirety, in particular where what is requested conflicts with those matters of the Society's submission and those matters already agreed to with Te Taumutu Runanga. The requests made in this proposed amendment are not realistic and would not result in the retention of adequate social and economic wellbeing.	Oppose
<b>Fish and Game Council North Canterbury</b> Mr Scott Pearson PO Box 50 Woodend 7641	V1pLWRP - 661	The Society considers that the Plan already covers these matters sufficiently.	Oppose
<b>Royal New Zealand Forest and Bird Protection Society</b> Ms Jen Miller PO Box 2516 Christchurch 8140	V1pLWRP – 1251, 1260, 1261	The changes and amendments proposed in this submission are inappropriate and are already adequately provided for in the Plan. Also, any review of policies and rules of a plan are provided for under the appropriate mechanisms set out in the Resource Management Act and do not need to be stated specifically in the Plan.	Oppose
<b>Fish and Game Council North Canterbury;</b>  <b>Royal New Zealand Forest and Bird Protection Society</b>	V1pLWRP – 643  V1pLWRP – 1253	The Society considers the existing wording of the policy is adequate and suitable.	Oppose  Oppose

<b>Lochlea Farming Co Ltd</b> Mr Brent Fisher 2105 Christchurch Akaroa Road RD 2 Christchurch 7672	V1pLWRP – 1062, 1067, 1068, 1071, 1072, 1073	The Society supports the stance of this submitter and their reasoning.	Support
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b>	V1pLWRP – 383, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415	The Society opposes these proposed amendments in their entirety. The requests made in this proposed amendment are not realistic and would not result in the retention of adequate social and economic wellbeing.	Oppose
<b>Royal New Zealand Forest and Bird Protection Society</b>	V1pLWRP – 1263, 1265, 1266, 1267, 1268, 1269, 1271, 1273, 1274, 1275, 1286, 1296, 1291, 1292, 1304, 1288, 1289, 1290, 1270	It is inappropriate to impose time limits of 5 years within this section of the Plan given the wider timeframes set within it.	Oppose
<b>Te Taumutu Rūnanga</b>	V1pLWRP – 284	Timeframes are required in order to allow suitable management options to be developed which can come at a very high cost to farmers. It is important to have timeframes that are reasonably achievable and that will provide suitable outcomes for all parties.	Oppose
<b>Ellesmere Irrigation Society Inc</b> c/- C M Barnett Lakeside R D 3 Leeston 7683	V1pLWRP-480	The retention of the existing wording of this policy is the most appropriate option.	Support
<b>Bowden Environmental</b> Mr John Talbot PO Box 404 Kaiapoi 7644	V1pLWRP-584	The Society supports this submission with respect to not managing the groundwater and surface water as a single resource.	Support in part
<b>Trustpower Limited</b> Ms Laura Marra Private Bag 12023 Tauranga Mail Centre	V1pLWRP-979	The Society opposes this submission with respect to managing the groundwater and surface water as a single resource. The Society also has concerns regarding the matters raised about the Little Rakaia Zone and its management. These matters would be better dealt with in the future	Oppose

Tauranga 3143		through consultation between these two parties. This is given that aquifer testing in the area has proven that there are less than minor effects relating to stream depletion on the lowland streams and the Rakaia River.	
<b>Director General of Conservation</b> Mr Geoff Deavoll Planning & Permissions (RMA Group) Department of Conservation PO Box 4715 Christchurch 8140	V1pLWRP-217	Timeframes are required in order to allow suitable management options to be developed which can come at a very high cost to farmers. It is important to have timeframes that are reasonably achievable and that will provide suitable outcomes for all parties. Requiring these measures be met as soon as the Variation is operative is unworkable and inappropriate.	Oppose
<b>Fish and Game Council North Canterbury</b>	V1pLWRP-690	A recent review of groundwater take consents has already inserted minimum flow conditions on consents. Therefore the need to reference existing consents is redundant. Timeframes are required in order to allow suitable management options to be developed which can come at a very high cost to farmers. It is important to have timeframes that are reasonably achievable and that will provide suitable outcomes for all parties. To include existing consents here would result in further excessive burden on consent holders.	Oppose
<b>Te Taumutu Rūnanga</b>	V1pLWRP – 294	Further restriction is inappropriate before 2025 given that consent holders already have minimum flow conditions on their consents and that aquifer testing has proven that there are less than minor adverse effects caused by wells in the lowland stream area.	Oppose
<b>Te Taumutu Rūnanga</b>	V1pLWRP-297	The extent of the Cultural Landscape/Values Management Areas is excessive and the associated provisions extremely onerous which will result in significant adverse effects on the social and economic wellbeing of the affected communities.	Oppose
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b>	V1pLWRP-427, 437, 442, 443, 444, 447, 448, 431, 429, 430, 432, 436	The extent of the Cultural Landscape/Values Management Areas is excessive and the associated new provisions extremely onerous which will result in significant adverse effects on the social and economic wellbeing of the affected communities.	Oppose
<b>Te Taumutu Rūnanga</b>	V1pLWRP-305	The proposed requirements in this submission are too onerous and would result in inappropriate third party involvement. The rules as proposed more than adequately protect the environment and already take into	Oppose

		account the environmental issues affecting all parties.	
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b> <b>Te Taumutu Rūnanga</b>	V1pLWRP-449  V1pLWRP-316	The Society opposes the insertion of a new matter of discretion stated as “the effects of the proposed take and use upon Ngāi Tahu cultural values.”	Oppose in part  Oppose in part
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b> <b>Te Taumutu Rūnanga</b>	V1pLWRP-540, 454  V1pLWRP-317	As stated above and the Society prefers its own recommended amendments to these rules.	Oppose  Oppose in part
<b>Director General of Conservation</b>	V1pLWRP-244, 245	It is inappropriate to attribute a ‘prohibited’ status to such activity when in practice there may be less than a minor adverse effect on the environment.	Oppose
<b>Director General of Conservation</b>	V1pLWRP-218, 219,	The timeframes set in the Plan are appropriate given the significant effect that these new provisions would have on existing operations in the subject areas. Significant discussions have been had in relation to this timing and a number of parties have agreed that 2025 is an appropriate timeframe.	Oppose
<b>Fish and Game Council North Canterbury</b>	V1pLWRP-671, 672, 673	It is not possible to impose phosphorus limits at this time and phosphorus leaching can only be dealt with appropriately on a site-by-site basis.	Oppose
<b>Director General of Conservation</b>	V1pLWRP-252	DoC needs to consult with adjacent landholders prior to imposing such sites.	Oppose
<b>Nga Rūnanga and Te Rūnanga O Ngāi Tahu</b>	V1pLWRP-461, 462	The information required to be kept and provided is onerous and in some cases relates to commercially sensitive information that is inappropriate to be provided to the public and is not required to be known for the purposes of nitrate leaching e.g. arable production yields. There is also no need to know building locations etc.	Oppose
<b>Te Taumutu Rūnanga</b>	V1pLWRP-304, 320	It is inappropriate to require this level of information and third party input in relation to the entire extent of the proposed Cultural Landscape/Values Management Areas.	Oppose

Royal New Zealand Forest and Bird Protection Society	V1pLWRP-1334	Same reasons as set out above.	Oppose
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## ELLESMERE IRRIGATION SOCIETY INCORPORATED

c/- Ms C M Barnett  
Lakeside, R D 3, Leeston 7683  
Ph: 03 3243429  
Email: [carey.barnett@xtra.co.nz](mailto:carey.barnett@xtra.co.nz)

5 June 2014

### **Environment Canterbury**

Freepost 1201

Variation 1 to the Proposed Canterbury Land & Water Regional Plan

PO Box 345

**CHRISTCHURCH 8140**

Dear Sir/Madam

### **Further Submissions on Proposed Variation 1 of the Proposed Canterbury Land and Water Regional Plan**

Please find attached further submissions on 'Proposed Variation 1 of the Proposed Canterbury Land and Water Regional Plan' from the Ellesmere Irrigation Society Incorporated.

If you have any queries regarding the attached information then please do not hesitate to contact Ms Carey Barnett – phone 03 3243429.

Yours faithfully

**ELLESMERE IRRIGATION SOCIETY INCORPORATED**

C M Barnett  
**Secretary**