

Gay Gibson

From: Erin Harvie <erin@bowden.co.nz>
Sent: Thursday, 23 October 2014 2:44 p.m.
Subject: Submission on Variation 2 the proposed CL&WRP
Attachments: Cover Page Submission - E.R.Harvie - Bowden Environmental.pdf; Submission on Variation 2 PLWP - E.R.Harvie - Bowden Environmental.pdf

Categories: Purple Category

EC238059-EC127127

Please find attached submission on Variation 2 of the proposed CL&WRP

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Submission on Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan

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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 24 October 2014 to:

Freepost 1201 Variation 2 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: ERIN ROSE HAEVIE Phone (Hm): _____
Organisation*: Bowden Environmental Phone (Wk): 03 3755015
* the organisation that this submission is made on behalf of
Postal Address: PO Box 404 Kaiapoi Phone (Cell): 027 434 7438
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Fax: N/A
Contact name and postal address for service of person making submission (if different from above):

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: _____

Date: 23/10/2014

(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.

- 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

Section 13.4 Policies, Page 4	Policies 13.4.11, 13.4.12 and 13.4.13	Oppose	<p>Policies 13.4.11 and 13.4.12 seek to include nitrate nitrogen limits and targets for the Hinds/Hekeao Plains Area. It is unclear what method has been used to calculate these limits and targets and hence one is unable to determine the appropriateness of these figures for the respective areas.</p> <p>Policy 13.4.13 seeks to restrict farming activities to reduce Nitrate Nitrogen to a target value of 3,400 tonnes of nitrogen per year in the Lower Hinds/Hekeao Plains. It is unclear what the basis for the percentage reductions are under Policy 13.4.13(b) and subsequent related Table 13(h).</p> <p>Policy 13.4.13 and related Table 13(h) refer to the term “dairy support”. This is a new term which has no definition under either Variation 2 or the Proposed Land Water Regional Plan.</p>	<p>Delete Policies 13.4.11 and 13.4.12. Amend Policy 13.4.13</p> <p>Include a definition of “dairy support” under section 13.1A: Definitions</p>
Section 13.5 Rules, page 12	Rule 13.5.33 and 13.5.34	Oppose	<p>Rules 13.5.33 and 13.5.34 classify the transfers of surface water and groundwater within the Valetta Groundwater Allocation Zone as a prohibited activity. These rules require the location of the take to not change. This requirement means that shifting the point of take on the same property due to, for example, a damaged bore or changes to location of take to support irrigation upgrades are not provided for. Amend the classification to non-complying.</p>	Amend Rules 13.5.33 and 13.5.34 to non-complying
Section 13.7, Tables, page 19	Table 13(f) Ashburton Section Groundwater Limits/Targets	Oppose	<p>The groundwater allocation limit of 148 (Million m³/yr) for the Mayfield Hinds Groundwater Allocation Zone as defined in the Proposed Land Water Regional Plan is consistent with the methodologies outlined in the Natural Resources Regional Plan for setting interim allocation limits. Variation 2 does not provide a reason for reducing this allocation limit down to 122.25 million m³/yr nor the method for how the reduced value was determined.</p>	Retain allocation limit of 148 million m ³ /yr and provide for a non-complying classification for the taking of groundwater. Also provide an “effective” allocation of 85% of the consented peak volumes to compare to the allocation limit.
Section 13.7,	Table 13(g)	Oppose	As outlined above it is unclear what method has been used to	Delete Table 13(g)

Tables, page 19			calculate the nitrogen load limit of 114 tonnes for the Upper Hinds/Hekeao Plains area and the target of 3,400 tonnes for the Lower Hinds/Hekeao Plains Area. Therefore, the appropriateness of these limits is uncertain.	
Section 13.7, Tables, page 19	Table 13(h)	Oppose	As outlined above, Variation 2 does not set out the basis for a percentage reduction of nitrate nitrogen loss.	Delete Table 13(h)
Section 13.10 Schedule, page 21	Schedule 7- Farm Environment Plan	Oppose	As a result of the above changes to Table 13(h), amendment is required to Schedule 7 to remove reference to table 13(h).	Delete reference to Table 13(h)