

From: [Haidee McCabe](#)
To: [Mailroom Mailbox](#)
Subject: Otaio Water User Group Submission - LWRPv3
Date: Saturday, 18 July 2015 9:04:04 a.m.
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[Otaio Water User Group Submission on Submissions - 17 July 2015 FINAL.pdf](#)

Please find attached submission on submission made by Otaio Water User Group



Haidee McCabe | [Environmental Consultant](#)

p 03 308 8587 extn 4

m 021 686 006

f 028 899 4423

e haidee@irricon.co.nz

w irricon.co.nz

a 32 Washdyke Flat Road,
PO Box 2193, Washdyke, Timaru

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Further Submission on Variation 3 to the Proposed 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 submission by **5.00pm Friday 17 July** to:

Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Otaio Water User Group (OWUG) _____ **Phone (Hm):** _____

Organisation*: _____ **Phone (Wk):** 033088587 _____

* the organisation that this submission is made on behalf of

Postal Address: c/ Haidee McCabe, PO Box 2193, Washdyke, Timaru **Phone (Cell):** 021686006 _____

_____ **Postcode:** 7984 _____

Email: haidee@irricon.co.nz _____ **Fax:** _____

Contact name and postal address for service of person making submission (if different from above):

Only certain people can make further submissions. The option that applies to you:

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

I do wish to be heard in support of my further submission and I would be prepared to consider presenting the further submission in a joint case with others making a similar submission at any hearing.

Signature: 

Date: 17 July 2015

(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 oppose/support the submission of:		The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	Support or Oppose
Name of original submission	Postal Address	Submission Point reference number	Reason	Note support or oppose
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-172 to 177	Support recommendations to resolve the nutrient management issues with the notified LWRP v3, particularly the request to hold a meeting to determine a resolution raised prior to a hearing.	Support
Dairy NZ	PO Box 85066, Lincoln University	V3pLWRP-399	Support recommendation to align planning processes as to two must align to avoid on-going issues with using the plans in the future	Support
Dairy Holding Ltd	PO Box 2510, Christchurch	V3pLWRP-415	Support recommendation that if Overseer is used within the plan, a mechanism must be put in place to allow for Overseer to be updated. As had been seen at individual consent level through the Environment Court in the Upper Waitaki, this has been done through the same input data being used to determine the new version of Overseer output.	Support
Nutrient Allocation Reference Group	PO Box 414, Ashburton	V3pLWRP-851 to 856	Support recommendations by NARG to utilise and align to MGM, to provide a mechanism to allow Overseer numbers to be updated to new versions, to use better soil information. Support recommendation to align planning processes as to two must align to avoid on-going issues with using the plans in the future	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-178-179	Support amendment to accurately summarise the balance between land use, water flow and allocation, and water quality. This balance of social and economic well-fare needs to be recognised and provided for.	Support
Ngai Tahu and Nga Runanga	PO Box 13-0046, Christchurch	V3pLWRP-138	This policy is supported in principal as it re-enforces what the OWUG and stakeholders have been working towards, by recognising the impact that surface takes can have on shallow groundwater by requiring a groundwater trigger levels before B permit surface takes can be exercised.	Support
Ngai Tahu	PO Box 13-	V3pLWRP-139	Oppose as this plan sets about reducing over allocation and	Oppose

and Nga Runanga	0046, Christchurch		balance must be had between environmental, social and economic activities within these catchments. Irrigators must have options and time to reduce over-allocation in combination with minimum flows	
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-139	Support as currently there is no link between loads/targets set along with instream thresholds and how these need to be updated to reflect newer Overseer versions. This is essential to actually make the plan work and not leave farmers with a consenting nightmare. Thought must be had now as to how this is really going to work.	Support
Horticulture NZ	PO Box 10 232, Wellington	V3pLWRP-275, 227 and 315	During Otaio River stakeholder meetings, this is something the OWUG seriously considered as the group had concerns that when minimum flows apply ceasing all abstraction, crops could perish. A lower emergency minimum flow was considered that would make provision for this, if a farmer had no other viable options. This was not supported collectively with stakeholders so had not been pursued by OWUG	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-183	Support as currently there is no link between loads/targets set along with instream thresholds and how these need to be updated to reflect newer Overseer versions. This is essential to actually make the plan work and not leave farmers with a consenting nightmare. Thought must be had now as to how this is really going to work.	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-184	Support as OWUG had sort clarity on this policy which is proposed by this submission.	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-185	Support as OWUG had sort amendment on this policy which is proposed by this submission.	Support
South Canterbury Federated	PO Box 414, Ashburton	V3pLWRP-199	Support the additions suggested to the policy. The addition to point c) is appropriate clarification	Support

Farmers				
Fonterra Co-operative Group	PO Box 2510, Christchurch	V3pLWRP-1000 and 1001, 1002, 1003	Support the amendments proposed, as provides clarity for washdown water takes. However these policies are for the replacement and change of condition consents, whereby many washdown takes had previously been operated under permitted rules and had been a grey area often not enforced by ECan. Therefore consideration should be had to the fact many will not be lawfully consented at present, and with no more allocation and consent potentially required, provision must be made for this.	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-205	Support the changes suggested with the addition of <u>consented</u> area of land. The changes to b) takes away the need for debate by establishing a set level of greater than 30mtrs deep.	Support
Ngai Tahu and Nga Runanga	PO Box 13-0046, Christchurch	V3pLWRP-142	The reference to "higher" is unclear as picked up by this submission but the intention remains. To remove doubt, agree it should read "less" than 3mtrs as suggested by the submission, that means the aquifer is full and B water abstraction should be allowed to be taken, as it will not affect re-charge.	support
Central South Island F&G	PO Box 150, Temuka	V3pLWRP-375	This provides some clarity over how much water has been allocated. The problem right now is we believe Ecan do not know what the numbers are because they keep changing the methods used to calculate it.	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-243 and 246	Support recommendations made which allow for stockwater and washdown water to be provided for without minimum flow restrictions. Furthermore provision must be made for allocation given the catchments are over-allocated and if consent is now required.	Support
Blue Cliffs Station	Po Box 2117, Timaru	V3pLWRP-435	Support recommendations made which allow for stockwater and washdown water along with other commercial uses, to be provided for without minimum flow restrictions	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-234, 238, 241, 242,	OWUG supports the recommendations and resolutions determined by SCFF on nutrient management rules	Support

Fonterra Co-operative Group	PO Box 2510, Christchurch	V3pLWRP-992	Support, as this also clarifies that this rule is not related to other smaller uses, and is primarily aimed at irrigation.	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-249, 259, 253, and 255, 260	Support clarifications sought by SCFF on rule amendments that reflect the same intent proposed by OWUG submissions.	Support
Blue Cliffs Station	Po Box 2117, Timaru	V3pLWRP-436	Support proposed amendments as consider this provides further clarity to the intent of the rule.	Support
Otaio Water User Group	PO Box 2193, Washdyke, Timaru	V3pLWRP-558	We have submitted on our own submission as from reviewing Ngai Tahu submission we support the corrected groundwater level wording to reflect the intention (V3pLWRP-122) – ie “the depth to water in bore J39/0255 is LESS than 3 metres below ground level. Therefore we recognise this further amendment to this rule is required.	Support with amendment
Central South Island F&G	PO Box 150, Temuka	V3pLWRP-384	From reading the actual submission this submission, it appears to be generic to all the Tables, not just 15(h) but (i) and (j) also. If that is the case, then this is opposed. F&G were represented strongly at the Otaio River stakeholder meetings whereby Table (i) and (j) were collaboratively determined to balance the needs of all stakeholders and the actual characteristics of the Otaio River catchment. From further discussions with F&G we hope they clarify this matter in their further submission that they do support these tables for the Otaio River.	Oppose
Central South Island F&G	PO Box 150, Temuka	V3pLWRP-365	Agree with recommendation that Table k) needs to have numbers in it or be quantifiable some numbers put into table K but Ecan don't have those numbers available.	Support
South Canterbury Federated Farmers	PO Box 414, Ashburton	V3pLWRP-219, 217, 220, 221	Support recommendations by SCFF, to resolve the nutrient management issues identified	Support