



## Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

C16/30710

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FILE REF: PLAN/WTAK/1P/630/2	
DOCUMENT No:	
11 MAR 2016	
Jason McDonald	
Brett Aldridge	
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 11 March 2016 to:

Freepost 1201 Plan Change 5 to LWRP  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: Christopher John Marshall Phone (Hm): 03 312 6717  
Organisation\*: PRIVATE Phone (Wk): "  
\* the organisation that this submission is made on behalf of  
Postal Address: 419 MILL ROAD Phone (Cell): N/A  
Ohoka, RD 2, Kaiaipo 7692 Postcode: 7692  
Email: classics@ihug.co.nz Fax: 03 312 6990  
Contact name and postal address for service of person making submission (if different from above):  
EMAIL SUBJECT LINE CHRIS ECAN

### 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: Chris Marshall

Date: 10 MARCH 2016

(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

## Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

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FILE REF:		
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11 MAR 2016	ACTION	INFO
<i>Saron McDonald</i>		
Submitter ID:		
File No:		

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P O Box 345  
Christchurch 8140

Full Name: <u>Christopher John Marshall</u>	Phone (Hm): <u>03 312 6717</u>
Organisation*: <u>PRIVATE</u>	Phone (Wk): <u>"</u>
* the organisation that this submission is made on behalf of	
Postal Address: <u>419 <del>WILLIS ROAD</del> MILL ROAD</u>	Phone (Cell): <u>N/A</u>
<u>Ohoka, RD 2, Kaiapoi 7692</u>	Postcode: <u>7692</u>
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**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: *CS. Newsham*

Date: 10 MARCH 2016

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

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- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | I <u>do not</u> wish to be heard in support of my submission; or  |
| <input type="checkbox"/>            | I <u>do</u> wish to be heard in support of my submission; and if so,  |
| <input checked="" type="checkbox"/> | I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing |

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>		(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
				That Canterbury rivers are supported by policies that will return them to a safe to swim standard in summer with low river flows

Add further pages as required – please initial any additional pages.

C. S. Tresslow  
10/3/16



My name is Christopher John Marshall. I hold a National Certificate in Agriculture with credit and I farmed for 30 years in the UK running arable and livestock on 1200 acres. I have also been involved in the management of 2200 acres of semi-intensive farming and understand the difficulties of modern farming and it's appropriateness to maintain a clean environment.

My provision is that Canterbury Rivers should be supported by policies which will, in an achievable length of time, support rivers which are safe to swim in.

Therefore the rules must support this policy.

I am unable to approach each rule individually within the policy as it stands, but advocate the following:

The vision to reach clean rivers which may be described as "safe to swim during low flows in summer" would be a sensible target for Canterbury rivers that have a history of public use for swimming as well as fishing and other water based activities and sports.

To base the National Objectives Framework on the Government's stated target of "wadeable and boatable" would lock in this standard (if it were applied during resource consent) for all activities based within a catchment whether it be agricultural, horticultural or industrial.

I cannot see that unless individual rivers have higher environmental standards than the "National bottom line" that resource consent applications or committees considering these would have any weight in an argument that a higher standard should be applicable. Without some policy that is clear and agreed applicants and their legal representatives would state that there was no other standard that they could adopt into their management outcomes.

In my experience consents for agricultural activities eg water abstraction for irrigation have a long term life for use of the resource. Should an application for an agricultural or horticultural activity require a resource consent it is likely that it too would require a long term consent to make it economic and a secure investment proposal. It is the activities that will require consents that will have the potential for environmental impact and therefore it would seem that the low standard of the "National bottom line" would become locked in and that the speed of improvement of water quality within Canterbury's rivers would be compromised for human generations rather than a three to seven year period.

But there are advocates for the ability of a modern scientific approach to cope with the pollution from human activities. There are events that were unexpected and not forecasted at the beginning of an activity which it is hoped a scientific approach will clean up.

C.J. Marshall  
10/3/16

The precautionary approach has merit in dealing with the potential harm, though it can put frustrating road blocks in the way of development. In my experience as a farmer and land-owner this isn't necessarily a bad thing as it makes one consider alternatives and can lead to a better outcome.

I therefore submit that the "National bottom line" is inadequate if applied across Canterbury's rivers to improve water quality which there is no doubt the general population require. I feel that there should be a policy that creates incentive to improve the rivers' water quality that can be applied with a strong encouragement and some better base requirements but with flexibility.

Our rivers are in a poor condition which cannot be denied and now is perhaps our real chance to apply forward looking policies that will, in time, give us the rivers in a clean and green and pure condition to support the branding that some politicians apply to New Zealand.

Christopher Marshall

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*Chris Marshall*  
*10/3/16*