

From: [Lyn Parlano](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan attached on behalf of West Edge (Henry Williamson) [DC-Documents.FID1390340]
Date: Friday, 11 March 2016 2:22:35 p.m.
Attachments: [20160311141956866.pdf](#)
Importance: High

Hi

Please note this replaces the earlier submission we sent in earlier today for Mr Williamson, it incorrectly had Benmore Irrigation on the form.

Regards
Lyn

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

FOR OFFICE USE ONLY

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: HENRY WILLIAMSON Phone (Hm): 021 704 583
Organisation*: West Edge Phone (Wk): _____
* the organisation that this submission is made on behalf of
Postal Address: c/o DUNCAN COTTERILL Phone (Cell): _____
BOX 5 CHRISTCHURCH ATTN E. CHAPMAN Postcode: 8041
Email: hae_williamson@yahoo.co.nz Fax: (03) 3797 697
Contact name and postal address for service of person making submission (if different from above):
Erin. chapman @ duncan-cotterill.com

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: 10.3.2016

(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

(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	
15.5.18B		Oppose	<p>West Edge is opposed to the limit of 1.6kg/ha/yr allocation limit placed on the Haldon zone for the following reasons:</p> <ul style="list-style-type: none"> • The spreading of a “headroom” allocation rateably across all properties does not reflect practice. There will be undoubtedly areas that meet the thresholds for irrigation (below 900m and at a slope of <25°) but will never in practice be irrigated – or developed further. • The allocation of headroom needs to reflect prior applications to the notification of PC5 to ensure that the headroom allocation factors in the outcome of that application • The allocation of headroom resource is contrary to the “first come-first served” principle of the RMA • Applications for headroom in the Haldon catchment need to satisfy that it meets the purpose of sustainable management under the RMA – the arbitrary allocation under this section does not meet the Act’s purpose 	<p>West Edge seeks a process whereby the allocation of available headroom is allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment.</p> <p>To do otherwise will lead to an overly conservative allocation model whereby all land users understand that there is available headroom but that it is “locked –up” in unusable portions of the catchment that are, because of physical and farming constraints unable to ever take up or use the allocation.</p>
Schedule 27		Oppose	West Edge opposes the unutilised portion of the Haldon Zone Load Limit on the basis that it has not factored in the allocations associated with applications currently before Ecan and awaiting processing.	<p>S 88A preserves the status of an application on a first come first served basis to apply for and be granted an allocation for a particular project.</p> <p>West Edge wants the plan changed to provide proof that the unutilised portion of 66Tonnes</p>

				reflects the prior application of Benmore Irrigation Company Limited
Consultation on PC5		Oppose	<p>Farmers at meetings in preparation for PC 5 were informed that the “numbers were not important” This was misleading of the process and the outcome of PC 5 as notified .</p> <p>There was potentially consultation with industry groups but no consultation with the farmers directly affected by the procedures being introduced by PC 5.</p> <p>Farming practices require a 3 year lead –in time to any changes associated with on-farm development or any limitations on development.</p>	Consult on the specific numbers so that users of the plan have a clear understanding of their legal effect and the basis for calculation.
Good Management Practice		Oppose	<p>Farmers need practical guidelines of how GMP is to be applied in practice.</p> <p>GMP is not formulated to an extent that farmers can determine whether they are compliant with the plan or not – and whether resource consents are required or not.</p> <p>Specific practices will be more or less appropriate to each zone</p> <p>In the lake sensitive zone West Edge is unable to ascertain from the plan as to whether it will fully meet GMP for the areas of irrigation for which West Edge holds consent.</p>	<p>West Edge requires greater specificity of what farmers need to undertake to meet GMP requirements now.</p> <p>West Edge does not oppose the concept of GMP's but has no basis from the plan itself as to what measures are required.</p> <p>Clearly this is an issue because consent processes are dependent on whether GMP is met on a case by case basis.</p>
Point Source discharges: Aquaculture 15B.5.3		Oppose	<p>Aquaculture and its contribution of nutrients into surface water is a major source of contention. This is particularly the case where Aquaculture ventures are developed in close proximity to intensive farming operations.</p> <p>Issues of causation of a deterioration in water quality between farming and aquaculture need to be resolved in this plan</p>	In situations where water quality deteriorates the plan needs to specify how and when aquaculture must modify its practices. Aquaculture has an immediate and direct effect on the quality parameters
15B.4.18		Oppose in part	<p>West Edge has part of its property identified in a Sensitive Lake zone but considers that the boundary definition of the Sensitive Lake Zone goes well beyond the sphere of influence .</p> <p>This requires correction to the planning maps</p>	Correction of the planning maps

15B.5.6		Oppose in part	West Edge is part of the Benmore Irrigation Scheme which has current applications prepared in accordance with the relevant plans when submitted – these applications should proceed in accordance with the status at time of application	Amend wording to record 15B.5.6.b.ii reads <u>An application was applied</u> for prior to 13 February 2016
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