
From: Bianca Sullivan <bianca@enviser.co.nz>
Sent: Monday, 26 March 2018 3:33 p.m.
To: Mailroom Mailbox
Cc: andrew@amuriirrigation.co.nz
Subject: LTP SUBMISSION
Attachments: LTP 2018 submission 20180326.pdf

Hi there

Please find attached a submission on the Long Term Plan by Amuri Irrigation Company.

Kind regards
Bianca

Bianca Sullivan
Director



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26 March 2018

Environment Canterbury
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Dear Councillors

RE: Submission on Environment Canterbury's Long Term Plan 2018-2028

We appreciate the opportunity to submit on your Long Term Plan 2018-2018. It is an important document and we acknowledge the significant amount of work that has gone into preparing it. Our submission points below are presented under the portfolio and work programme headings included in the Long Term Plan.

Freshwater Management

Consent reviews

We acknowledge the use of resource consent reviews instead of or in addition to plan change proposals in local catchment areas, as discussed under the Resource Management Act Water Framework programme (page 18).

We consider that priorities for consent reviews should be guided by Zone Committees, with catchment objectives and outcomes clearly defined prior to any reviews being initiated. Collaboration with consent holders to achieve the Zone Committee's identified outcomes should be encouraged as an alternative to consent reviews. In this way, relationships are strengthened, positive environmental outcomes can be achieved, and potentially adversarial and expensive statutory review processes can be avoided.

We note the reference to consent reviews in the Ashburton River / Hakatere catchment area. We have no background information on prioritising reviews in this catchment, however consider that any decision on priority areas for review should be based on Zone Committee recommendations and be made only after more collaborative approaches have been fully explored.

Plan reviews / variations

A schedule for the notification of RMA plans or variations is included in the Resource Management Act Water Framework programme (pages 18-19). Targets 1.4.1d-f are for variations to implement the National Planning Standards. It is our understanding that a review of the Hurunui and Waiau River Regional Plan will be included within these work programme targets. We support this review and request that it be specified within Measure 1.4.1.



Cultural Land Management Advisor

A Cultural Land Manager role is proposed for the northern districts of Canterbury as part of the Zone and Regional Delivery work programme (page 17). We support the creation of this role and would welcome the opportunity to work alongside this person to help enhance the cultural values within our scheme area.

Additional monitoring

We support the additional river flow and periphyton monitoring positions that are proposed as part of the Environment Monitoring and Progress Reporting work programme (page 15). Both of these positions will provide valuable information, however we are unclear what aspects of your monitoring programme will be lost to provide for additional river flow monitoring. This information should be included in the Plan.

Biodiversity and Biosecurity

Braided River Plans

We support the proposal to work with communities to prepare non-statutory Ki Uta Ki Tai plans for braided rivers (page 26). With one plan produced each year from June 2020, this is a long term project. Water zone committees should be asked to recommend priority braided rivers for the preparation of such plans.

Ownership of braided river / land margins

A Braided River Action Group project to establish ownership of river margin land is proposed to be completed by 30 June 2019 (page 27, Target 5.3.2). We acknowledge the need for this work and would like to emphasise the importance of the proposed partnership approach to the project's success.

Hazards, Risk and Resilience

Climate Change Integration

We support Environment Canterbury's proposed Climate Change Integration work programme (pages 36-37). Sharing climate change data and knowledge will help inform constructive dialogue on managing climate change risks.

Thank you for considering our submission. We would like to meet with Councillors in Christchurch to discuss our submission. To arrange a suitable time, please email Andrew@amuriirrigation.co.nz or phone 022 318 5488.

Yours sincerely



Andrew Barton
CEO