

From: [Brittany Paton](#)
To: [Mailroom Mailbox](#)
Cc: [Brian Ellwood](#); [Warren Armstrong](#)
Subject: Hurunui Waiau Regional Plan Submission PC1
Date: Friday, 31 May 2019 9:54:49 AM
Attachments: [image001.png](#)
[image003.jpg](#)
[HurunuiWaiauRegionalPlanSubmission_PC1_EPI-190531.pdf](#)

Please find attached a submission from Emu Plains Irrigation Incorporated on Plan Change 1 to the Hurunui Waiau Regional Plan.

Kind Regards,
Britt Paton

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Submission on Proposed Plan Change 1 to the Hurunui and Waiau River 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 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 31 May to:

Freepost 1201
Plan Change 1 to the Hurunui Waiau River Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

| | |
|--|-------------------------------------|
| Full Name: <u>Warrn Keith Armstrong</u> | Phone (Hm): _____ |
| Organisation*: <u>Emu Plains Irrigation Incorporated</u> | Phone (Wk): _____ |
| * the organisation that this submission is made on behalf of | |
| Postal Address: <u>C/- Warren Armstrong 1153 Leslie Hills Rd Culverden</u> | Phone (Cell): <u>027 327 9099 5</u> |
| _____ | Postcode: _____ |
| Email: <u>lorrainevlarsen@gmail.com</u> | Fax: _____ |
| Contact name and postal address for service of person making submission (if different from above): | |
| _____ | |
| Brian Ellwood, Lowe Environmental Impact, P O Box 29288 Christchurch, 021676052 | |
| _____ | |
| Brian@lei.co.nz | |
| 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: | |
| <input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission, | |
| <input type="checkbox"/> or I <u>could</u> gain an advantage in trade competition through this submission. | |
| If you have ticked this box please select one of the following: | |
| <input type="checkbox"/> I <u>am</u> directly affected by an effect of the subject matter of the submission | |
| <input type="checkbox"/> I <u>am not</u> directly affected by an effect of the subject matter of the submission | |
| Signature: <u>[Signature]</u> | Date: <u>31/5/19</u> |
| <small>(Signature of person making submission or person authorized to sign on behalf of person making the submission)</small> | |

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information

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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 my 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 | |
| Section 3.3 pg 5, 6, 7 and 8 | Rule 10.1, Rule 10.1A Rule 10.2 Rule 11.1 | Oppose | <p>The effects on periphyton growth in the Waiau Uwha River of the additional discharge of nutrients permitted has not been considered in conjunction with resource consents granted but not implemented and resource consent applications that have been made before the notification date of this plan change.</p> <p>The section 32A Evaluation on pg 16 has assumed that the increase in nutrient loss by dryland farmers above the current 10% allowance has priority over applications for landuse change and the discharge of nutrients to the Waiau Uwha River made by Emu Plains Irrigation Incorporated. It is assumed that the cumulative effects assessment burden is solely a matter for Emu Plains</p> | <p>Ecan reassess the cumulative effects consequential to this proposed plan change and known discharges to the Waiau Uwha River.</p> <p>The plan change be granted on the basis of the combined cumulative effects of the increase in discharge of nutrients to the Waiau Uwha River by the Dryland Farmers, resource consents granted but not implemented and resource consents for landuse change that have been applied prior to the plan's notification are acceptable.</p> <p>Should the cumulative effects of the increased dryland discharge, resource consents granted but not implemented and applications in process increase the risk of periphyton growth to a level that is not acceptable, then the PC 1 rules and definitions shall be amended so that the scale of the increase in dryland discharge is reduced to an acceptable level or the plan change be declined in its entirety.</p> |
| Section 5.1 Pg 13 | Definition of Low Intensity Dryland Farming | Oppose | <p>The assessment of effects supporting PC1 has not considered the cumulative effects on the Waiau Uwha River from the allowances for Winter Grazing across and associated increase stock numbers in conjunction with resource consents granted but not implemented and resource consents applications that have been made before the notification date of this plan change.</p> | <p>Ecan reassess the cumulative effects consequential to this proposed plan change and known discharges to the Waiau Uwha River. Should the cumulative effects of increased dryland discharge and applications in process increase the risk of periphyton growth that is not acceptable then the rules and definition shall be amended so that the scale of the increase in dryland discharge is reduced to an acceptable level or the change be declined in its entirety.</p> |
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Add further pages as required – please initial any additional pages.