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

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: [Signature] Phone (Hm):
Organisation*: Emu Plains Irrigation Incorporated Phone (Wk):
* the organisation that this submission is made on behalf of
Postal Address: C/- Warren Armstrong 1153 Leslie Hills Rd Culverden Phone (Cell): 027 327 9098
Fax: 021676052
Email: lorrainevliarsen@gmail.com Postcode:
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

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: [Signature] Date: [24/1/9]

[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.
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 3.3 pg 5, 6, 7 and 8</td>
<td>Rule 10.1, Rule 10.1A Rule 10.2 Rule 11.1</td>
<td>Oppose</td>
<td>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. 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</td>
</tr>
<tr>
<td>Section 5.1 Pg 13</td>
<td>Definition of Low Intensity Dryland Farming</td>
<td>Oppose</td>
<td>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.</td>
</tr>
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<td>Ecan reassess the cumulative effects consequential to this proposed plan change and known discharges to the Waiau Uwha River. 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. 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.</td>
</tr>
</tbody>
</table>

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