

From: [John Richardson](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 2 and Plan Change 7 to the LWRP - Submissions
Date: Saturday, 7 September 2019 5:01:14 PM

Dear Sir/Madam

Please find attached documents comprising my submissions for the above LWRP changes.

These comprise:

1. A covering letter
2. Two versions of Form 5 with my personal and contact details
3. Two PDF files of tabulated comments on Changes 2 and 7 to the LWRP

Please arrange for confirmation of receipt of these papers.

With thanks,

J.Richardson



**Submission on Proposed Plan
Change 2 to the
Waimakariri River 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 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 2 to the Waimakariri River Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: JOHN RICHARDSON Phone (Hm): 03 310 8432
Organisation*: PRIVATE SUBMISSION Phone (Wk): /
* the organisation that this submission is made on behalf of
Postal Address: 34 ADIAN WAY Phone (Cell): /
LOBURN RANGIORA Postcode: 7472
Email: richardsonj162@gmail.com Fax: /
Contact name and postal address for service of person making submission (if different from above):

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: J. Richardson Date: 09/09/2019
(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 my submission in a joint case with others making a similar submission at any hearing



**Submission on Proposed Plan
Change 7 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 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 7 to the Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: JOHN RICHARDSON Phone (Hm): 03 310 8432
Organisation*: N/A PRIVATE SUBMISSION Phone (Wk): /
* the organisation that this submission is made on behalf of
Postal Address: 34 ADIAN WAY Phone (Cell): /
LOBURN KAHGIORA Postcode: 7472
Email: richardson.j162@gmail.com Fax: /
Contact name and postal address for service of person making submission (if different from above):
/

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Environment Canterbury,
PO Box 345,
Christchurch 8140

**34 Adian Way,
Loburn,
RD2 Rangiora,
Canterbury 7472
New Zealand**

Tel. +64 (0)3 310 8432

7th September 2019

E: richardsonj162@gmail.com

Dear Sir/Madam,

Submissions on Plan Change 2 and Plan Change 7

Please find enclosed herewith submissions of Plan Changes 2 and 7 together with the first part of your pro-forma Form 5 as indicated on the ECan website.

I would wish you to note formally my dissatisfaction with the overall conduct of this consultation process. In particular I would have you note the following specifics:

1. The forms were unavailable for download for a significant period, with the ECan website repeatedly returning error messages ("Resource not found"). I had eventually to get a staff member to Email out forms as attachments.
2. The versions of the Plan Change documents on the website are poorly formatted. In several instances table headings are split from the body of the table, there are inappropriate page breaks and other formatting errors. There are a number of apparent textual omissions or syntactical errors and at least one instance where different tables are given the same number. The documents are simply not of an acceptable professional standard.
3. The need to use pro-forma tables with fixed spacing, as appended to "Form 5", is unnecessarily restrictive. It makes for needless difficulties in making meaningful comment. The pdf versions attached, however, utilise exactly the same layout as the ECan Form 5 tabulation and thus should prove acceptable.

Please arrange for confirmation of receipt of these submissions.

Yours faithfully,

J Richardson

John Richardson

Submission on Plan Change 7 John Richardson				
Section and page number(s)	Sub-section/point	Oppose/Support Part or in full	Reasons	I seek the following decision(s) from Environment Canterbury
General	Pre-amble and introduction specifically the <u>the timing of notification</u>	<u>Oppose</u>	<p>Timing of notification before fully elected Council in place means:</p> <ol style="list-style-type: none"> 1. Plan changes not fully democratic 2. No locus for the Environment Court in any future disputes 3. Decisions based on advice from Zone Committees may be tainted because of possible conflicts of interests of some members 4. Timing effectively negates effects of the new national policy statement on freshwater quality Gives impression that ECan may be seeking to avoid stricter requirements. 	Declare a moratorium on the appointment of commissioners and any such plan changes until the establishment of a fully elected Council or the New Freshwater Policy Statement is gazetted whichever comes first.
<u>Without prejudice to the above opposition to the timing of notification I would also comment on certain specifics</u>				
4.31 4.32 p.17	Stock exclusion	Support		Implement
4.61 A p.18	Indigenous fish habitat	Support (a) not (b)	(b) ineffective	strengthen (b)

Submission on Plan Change 7 John Richardson				
Section and page number(s)	Sub-section/point	Oppose/Support Part or in full	Reasons	I seek the following decision(s) from Environment Canterbury
4.101 to 4.103 incl pages 19 - 21		Support in full		
5.71 p. 32	protection of spawning sites bathing sites and spring-fed plains rivers	Support in full		
5.112 p.35		Support in part only	Need to spell out what constitutes "reasonable" domestic use and "reasonable" stock water use else provision is 'hostage to fortune'	Clarify meaning of "reasonable"
5.123 5.126 and 5.128 pages 37 and 38	Water take provisions	Support in part only	Overly complex and legalistic	Replace with some Plain English!
5.133 p.39	Transfers of consents	Support in part only	Needs to be tightened up - must be for the same use	Clarify so as to give effect to <u>no change of use</u>
5.138 through to 5.140A pages 41 and 42		Support		
5.161 p45 5.170 p48 5.189 and 5.190 p.51, 52	Wetlands tree planting etc	Support		Implement
Section 7 Table 6 p54		Support		
Page 59 2nd para	Error of omission			Correct

Submission on Plan Change 7 John Richardson				
Section and page number(s)	Sub-section/point	Oppose/Support Part or in full	Reasons	I seek the following decision(s) from Environment Canterbury
Table 8.1 p90	Environment Flow and Allocation Limits	Support in part only	Too weak - don't go far enough some limit changes seem tokenistic Unlikely to meet requirements of new Freshwater Policy Statements	Tighten up - increase minimum flows and over time decrease alloc limits
Table 8.2	Northern Tributaries of Waimakariri flow and alloc limits	Support in part only	Changes in limits for some streams appear little changed	Increase limits to those actually likely to make a significant difference to water quality
Table 8.7 p.94	Nitrate Nitrogen Limits	Oppose	Limits are too high - needs a more precautionary approach and as for Table 8.1 won't meet the requirements of the new Freshwater Policy Statements	Adopt lower, more effective, limits in line with those recommended in the new Freshwater Policy statement
Table 8.8 p95	Nitrate Nitrogen Limits	Oppose	As above The targets for the Cust and Eyre rivers are too high	Take a more precautionary approach and lower these limits
Table 8.9 p 95	Nitrogen 'Loss' (i.e. pollution) reduction targets	Support in part only	Some of these targets are too unambitious certainly any pressure to lower them is to be resisted.	At the very least stick to these targets and preferably accelerate the process
Tables 8.8 and 8.9 p 96 <i>BUT note duplication of numbering error</i>	Flow sensitive catchments High 'naturalness etc	Support		
Sections 14.4.2 to 14.4.5 p131	Various provisions	Support		

Submission on Plan Change 7 John Richardson				
Section and page number(s)	Sub-section/point	Oppose/Support Part or in full	Reasons	I seek the following decision(s) from Environment Canterbury
Tables 14(h) through to 14(w) pages 164 - 168	Flow and Allocation Regimes	Support in part	Some changes to minimum flow for some watercourses appear merely cosmetic	Tighten up figures for minimum flow and use more realistic figures that might make a practical difference
14.6.4 table 14(zc) p173	Reductions in nitrogen 'loss' (i.e. pollution)	Support only partly	Reductions too small and timescales too long	Require deeper cuts in nitrogen pollution over shorter timescales
14.7 p174	Flow-sensitive catchments	Support		Implement same
Schedule 8 p200 et seq	Nitrogen as nitrate limits	Oppose	Limits are too high especially for groundwater at 5.65 mg/l a pre-cautionary approach is needed	Lower these limits to internationally accepted values

Submission on Plan Change 2 John Richardson				
Section and page number(s)	Sub-section/point	Oppose/Support Part or in full	Reasons	I seek the following decision(s) from Environment Canterbury
General	Pre-amble and introduction specifically the <u>the timing of notification</u>	<u>Oppose</u>	<p>Timing of notification before fully elected Council in place means:</p> <ol style="list-style-type: none"> 1. Plan change 2 not fully democratic 2. No locus for the Environment Court in any future disputes 3. Decisions based on advice from Zone Committees may be tainted because of possible conflicts of interests of some members 4. Timing effectively negates effects of the new national policy statement on freshwater quality Gives impression that ECan may be seeking to avoid stricter requirements. 	Declare a moratorium on the appointment of commissioners and any such plan changes until the establishment of a fully elected Council or the New Freshwater Policy Statement is gazetted whichever comes first.

Without prejudice to the above opposition to the timing of notification I would also comment on certain specifics

Submission on Plan Change 2 John Richardson				
Section and page number(s)	Sub-section/point	Oppose/Support Part or in full	Reasons	I seek the following decision(s) from Environment Canterbury

Policy 5.1	5.1(4)	Support in general terms	5.1(4) needs to recognize that high flows are also absolutely necessary for the health of braided rivers and water takes for storage need to be controlled accordingly. Recent breaches of the WCO on the Rakaia are a concern in this regard.	A decision to ensure control of abstraction at high as well as at low flows
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