

**From:** [Mike Kemp](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Tuesday, 10 September 2019 5:01:11 PM

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Submitter ID:

File No:

## Submission on Proposed Plan Change 7 to the Canterbury Land and Water 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 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:** Mike Kemp

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**Organisation\*:**

**Phone (Wk):**

\* the organisation that this submission is made on behalf of

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**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:**

**Date:** 10 Sep 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

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that:  (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(3) I seek the following decisions from Environment Canterbury:  (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.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
4	4.79, 4.80	Support in part	<p>Does not go far enough to protect waters from this activity. It is reasonably expected that the proposed changes throughout the plan will have a range of responses. One might be non-compliance, another will be the planned adjustment to practices in order to meet the standards, but also there should be expected notable displacement from one commercial activity to another. Therefore, all activities conceivably impacting on water quality need similarly robust provisions – to limit the activity, and to constrain the activity.</p> <p>Hazardous Activities including Hydrocarbon exploration and fracking should not be entertained at all in these catchments given the dependence of such a large population on those catchments for access to healthy water, for drinking and all the other uses listed in the plan.</p>	Reference to in-plan or other local or regional body efforts, plans, strategies to completely restrict new bores for Hydrocarbon and related activity.
4	4.99	Support in part	<p>There is a wide gap in this part of the plan to use MAR in order to continue to facilitate the ongoing over-use of water, in so far as that reduces availability or quality below generally acceptable levels. The cautious language used, such as ‘avoided AS FAR AS practicable’, ‘are MINIMISED’, ‘there is no NET loss’ and so on all leave the gate far to wide open to result in effect in the active support of MAR.</p> <p>I believe that MAR should be available, but ONLY as a one time (period to be set according to the science) tactical tool. I absolutely support the use of MAR with the provisions in place in order to rectify something that has gone wrong and where MAR remains the best remediation approach. But I equally oppose the use in any ongoing strategic fashion.</p> <p>Any long term redress of the volumes and quality of waters must come from reduction of the harmful extractions, abstractions, applications and other mismanagement that caused it. It must not come from MAR which might address volumes for example but none of the</p>	I’d like to see MAR clearly set out as a recovery tactic, and removed as a potential ongoing mitigation.

			consequential impacts from the ongoing activities that lead to it's use as a chronic strategy.	
8	Table 8.9	Support in part	<p>Given the research, findings and knowledge around potential lags in Nitrogen through the various water systems, I support the adoption of practical staged long term targets – to meet the set standards at the point of concern (be that aquifer, river, lake or other). But, to set such long drawn-out stages for targets to be met for reducing the Nitrogen Loss from Farming activities I find to be detrimental to meeting the intent of the plan change.</p> <p>Certainly some time is needed to change farming systems and adopt more sustainable practices, or even to change the type of farming done in any given farm or zone. However, I would see such reasonable and balanced period for this required change to be in the order of several seasons of farming.</p> <p>Alternatively, at a stretch you might look at it that it is reasonable to expect the practices to change ‘within a generation’.</p> <p>For new farmers born and bred into the situation we have now, where water is over-allocated, takes have reduced flows, bodies of water are excessively contaminated, the quality of drinking water is already compromised and expected to become more so – then if we imagine that as they turn to full time farming on their family or other land in 22 years’ time, and we imagine that they are still not farming in a sustainable way that no longer threatens our water quality then it is clear that a view of 20 to 30 years is in no way unreasonable.</p> <p>I contest that the staged approach to reducing losses of Nitrogen from farming activities should be pulled in significantly. The lag until the levels of background Nitrogen are back to typical (Unfarmed use) according to variances in different regions, zones, soils and so on, may well be 40 to 60 years, or more. But that does not excuse such an excessively drawn-out staging for the reduction in losses from what is considered to be the most significant contributor to that problem.</p> <p>Given some farmers have already made such significant changes recently, in only a few years, and had such dramatic outcomes reported widely in the press there is no general acceptance of the need to set such long staging.</p>	Set staging for Nitrogen Loss to be significantly shorter than proposed, more in the region of 10 to 20 years maximum.


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