

From: [Mary Sparrow](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP submission
Date: Wednesday, 11 September 2019 4:17:28 PM

Please find the attached submission on behalf of the Sparrow Family Trust and Mary Sparrow

Regards

Mary Sparrow

**SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND
WATER REGIONAL PLAN**

Submitter: Sparrow Family Trust and Mary Sparrow
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Trade competition declaration

I could not gain an advantage in trade competition through this submission; and

The Trust I represent is directly affected by the subject matter of submission on Policy 8.4.24

Signed



Date 10 September 2019

I **do** wish to be heard in support of my submission.

Our points of submission are as follows:

Reference	Oppose/Support	Reason	Decision Requested
Policy 8.4.25 Page 66	Oppose in part	It is recognised that in over allocated catchments the volume of ground water allocated needs to be reduced when consents are reviewed. Policy 8.4.25 only references consideration of past water use records, and the other matters to be considered should also be included in the policy to ensure the development of a balanced view in each case. It is important that in seeking to manage the taking of ground water where this is over allocated that the reductions imposed do not unduly constrain alternative land uses that would be able to meet other plan standards. Also while the groundwater across much of the Waimakariri Ashley Plain is in a single Eyre Allocation Zone, it may be appropriate to consider variations in groundwater patterns across the zone.	Add further criteria to be taken into account in addition to past water use records, including the level of water use in dry seasons, the land type in relation to providing the efficient use of water, the land use prevailing at the time of the replacement of the consent and other previous and potential future patterns of water use on the property, and location of the take within the relevant groundwater allocation zone.
Policy 8.4.35 Page 70	Support in part	The commitment to the preparation of 5 yearly monitoring reports is supported, but the scope of these reports should be widened. In particular, the range of previous land uses has varied across the Zone and these have had impacts on current water quality. It is therefore important that in addition to monitoring and reporting against the model projections on which the plan change relies, that local and legacy issues be identified, monitored and mitigation measures explored.	Add to Policy 8.4.35 following “ <i>outcomes and limits; and (e) the results of specific investigations undertaken to identify the effects of legacy and local issues impacting on ground and/or surface water nitrate-nitrogen levels, and how these can be mitigated.</i> ”