

**From:** [ECInfo](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** FW: Submission on PC7 EMAIL:09940017248  
**Date:** Thursday, 12 September 2019 11:40:02 AM

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Hello Team

This email came into our Customer Services email queue. Can you please workflow?

Kind regards

Alice

----- Original Message -----

**From:** Bowden Environmental  
**Received:** 12/09/2019 10:35 a.m.  
**To:** ECInfo; Mailbox Customer Services  
**Cc:** Croft Elizabeth; Croft Elizabeth Prudence; Croft Warwick; Croft Warwick Desmond; Mr & Mrs W D & E P Croft  
**Subject:** Submission on PC7

Good morning,

Please find attached a submission on PC7 made by Mr W D Croft.

Kind regards,

*Erin Harvie*

Environmental Consultant

Please note: my days of work are Monday to Thursday

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## 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: Warwick Desmond Croft Phone (Hm): 03 312 5895  
Organisation\*: \_\_\_\_\_ Phone (Wk): \_\_\_\_\_  
\* the organisation that this submission is made on behalf of  
Postal Address: 345 Ashley Road R.D.1 Phone (Cell): \_\_\_\_\_  
Rangiora 7471 Postcode: 7471  
Email: crofty5@xtra.co.nz 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: [Signature] Date: 11-09-19

(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 PC7 that Mr W D Croft submission relates to are:		(2) Mr W D Croft submission is that:		(3) Mr W D Croft seeks the following decisions from Environment Canterbury (ECan)
Section & Page Number	Sub-section/ Point	Oppose/ support (in part or full)	Reasons	
Section 8 Waimakariri Page 64	Policy 8.4.12	Oppose in part	Mr Croft was involved with the consultation process for the ZIPA in relation to the flow and allocation of the Cust River and he agrees that the requirement for a pro-rata reduction of a surface water take is sensible. However, concern is still held over what the cumulative effect will be of the numerous stock drinking water and community water supply within the specific area of the Cust River.	Amend policy 8.4.12 to reference that the cumulative effect of stock drinking water and community water supply on the Cust River Flows are taken into account.
Section 8 Waimakariri Page 70	Policy 8.4.36 and Policy 8.4.37	Oppose	Durations should be for the maximum in accordance with resource management. Short-term durations impede long-term planning. The use of the review of consents should be relied on. By holding a longer-term consent, enables confidence within a farming operation to allocate and spend capital to implement improvements.	Delete Policies 8.4.36 and 8.4.37
Section 8 Waimakariri Page 70	Policy 8.4.38	Oppose in part	Reviews are a valid method to implement a new Plan's flow and allocation regimes. Mr Croft was involved with the consultation process for the ZIPA. These discussions included the need for and timing of when review of consents may be undertaken to implement any new planning framework. The need for a review of consents to implement any new flow regime is supported; however, Mr Croft considers that a longer lead-in time would allow for any necessary on farm changes to cope with any decrease in reliability of supply.	Amend review date to that of the majority of consent expiry dates for the surface waterbodies. This is around the early to mid 2030s.
Section 8 Waimakariri Page 75	Rules 8.5.6 to 8.5.11	Oppose in part	These surface take rules refer to allocation limits specified in Tables 8.1, 8.2 and 8.3. There is concern as the allocation limits are Canterbury Regional Council staff calculations of the sum of all current surface take and groundwater stream depleting take consents. These summations have in the past been shown to be incorrect. The concern is that the limits in the Tables may unnecessarily restrict renewals simply because they have been incorrectly summed. The conditions of the rule provide	Delete from condition 2a of rule 8.5.9 the phrase following the abbreviation "...RMA...".  Condition 2b of rule 8.5.9 needs to refer to all consented takes that exist as at the date of the Plan, rather than a potentially incorrect summation for the allocation limit.

			that the activity becomes a non-complying activity under another rule, which is unfair simply because of an incorrect calculation. Mr Croft agrees that an allocation limit is required. It is only where the limit has been capped to the currently consented summation (and this is latter found to be incorrect) that the condition 2b needs amending. Region-wide policy 4.50 still applies for renewals, and this requires some reduction in over-allocated zones.	<p>Delete condition 13 of rule 8.5.9, or add reference to Policy 4.50 instead of seeming to require the first renewals to achieve all the reduction required to meet the allocation limit.</p> <p>Delete reference to 2a in rule 8.5.10</p> <p>There may be consequential amendments required to other rules</p>
Section 8 Waimakariri Page 91	Table 8.2	Oppose in part	The allocation limit for the Cust River appears to mostly be Canterbury Regional Council staff summation of current consent rates. There are concerns about using these figures. In the past, these summations (including direct takes and stream depleting groundwater takes) have been shown to be incorrect. This will unnecessarily restrict renewals of consents. Amendments have been requested in above rules, but the Table limits need to acknowledge this as well.	Request details of summations to confirm limits and add a note to the Table to provide flexibility should the summation later be shown to be incorrect.
		Support in part	The Cust River minimum flow is proposed to increase from 20L/s to 60L/s. Mr Croft was involved during the ZIPA consultation process relating to the environmental flow and allocation limits for the Cust River and supports the Minimum Flow for A permits of 60L/s.	Retain the minimum flow of 60L/s
		Oppose	During the ZIPA consultation period, Mr Croft repeatedly requested that a permanent recorder be installed at the minimum flow site for the Cust River rather than using a correlation with the Threlkelds Road recorder. This is still sought.	Amend minimum flow site to include a permanent recorder
		Oppose	The Cust River regime currently allows unlimited B allocation, and the proposed limit is set at 131 l/s. Again, this was discussed during the ZIPA process. These discussions did not conclude on what the B limit should be but outlined that a B allocation should be available and that further investigations would be undertaken to determine a limit. To date no further communication from the Canterbury Regional Council or the	Allow B allocation limit of 1,000 l/s.

			<p>Zone committee regarding the matter has been received. The proposed limit appears to be the summation of currently consented B permits. This needs to be confirmed. It is considered that when the river is in high flow, there is an opportunity to store water, typically during winter.</p> <p>The dates for implementing the new minimum flows appears to be 2027.</p>	Extend the implementation date to reflect most common consent expiry dates.
Section 8 Waimakariri Page	Definitions; – nitrogen priority areas and Nitrogen priority sub- areas	Oppose	<p>Mr Croft opposes the definition of the nitrate priority areas and the further sub-catchment areas. These zones are pitting neighbours against each other and is unintendedly picking winners and losers within the Waimakariri catchment area.</p> <p>Mr Croft is opposed to the use of a staged reduction as outlined in Table 8.9 within the nitrate priority areas. These staged reductions are based on modelling, which he considers does not have enough water quality information to provide certainty. Instead Mr Croft would prefer to see a focus on monitoring and measuring water quality to gauge the impacts of farming activities meeting good management practices prior to requiring any further staged reductions beyond GMP.</p> <p>Mr Croft considers that all farms should be implementing good management practices to achieve a positive impact on water quality. On Mr Crofts property he has already been undertaking good management practices, such as having all stock fenced out of waterways for the last 28 years and for more than 12 years implemented an on farm practice where the heavier wetter land was retired in wet conditions to conserve the soil structure and minimise risks to waterways. He has also spent significant time and investment on riparian planting in the wetter areas of the property over the last 18 months.</p> <p>Mr Croft expects that the proposed stage reductions in table 8.9 would require a reduction in stock numbers. At lower stock numbers the farm lessee will either ask for a reduction of the farm rental or he will give up</p>	Deleting in their entirety

			<p>the lease. If the farm become unprofitable to lease, it leaves Mr &amp; Mrs Croft with the options of either running the farm themselves again ( which is not what they would want to do given we are over 70 ) or be forced to put the farm on the market . Given the uncertainty of the future of farming we anticipate having to sell at a heavy discount to meet the market.</p> <p>Another selling option will be to subdivide into lifestyle blocks as the property has a large road boundary. This would put a productive farm out of action which is also not something which Mr &amp; Mrs Croft would like to see, given that the future population still needs to be feed.</p>	
Section 8 Waimakariri numerous pages	Policies 8.4.25, 8.4.26, 8.4.27, 8.4.29	Oppose	Mr Croft is opposed to the use of a nitrate priority area/s, Table 8.9 and the related staged reduction proposed for the reasons already stated above.	Delete all reference to Nitrate priority areas and Table 8.9 from policies and any other subsequent changes which need to occur following the deletion of these.
Section 8 Waimakariri numerous pages	Rules 8.5.22, 8.5.23, 8.5.26, 8.5.27, 8.5.30	Oppose	Mr Croft is opposed to the use of a nitrate priority area/s, Table 8.9 and the relating staged reduction proposed for the reasons already stated above.	Delete all reference to Nitrate priority areas and Table 8.9 from Rules and any other subsequent changes which need to occur following the deletion of these.
Section 8 Waimakariri	Table 8.9	Oppose	Mr Croft is opposed to the use of a nitrate priority area/s, Table 8.9 and the relating staged reduction proposed for the reasons already stated above.	Delete in its entirety and any other subsequent changes which need to occur following the deletion of this.

WDE