From:  dee.doug@farmside.co.nz
To:  Mailroom Mailbox
Subject:  Submission on proposed plan change 7 to the Canterbury Land and Water Regional Plan
Date:  Friday, 13 September 2019 10:49:21 AM
SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

Clause 5 First Schedule, Resource Management Act 1991

TO:

Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Environment Canterbury
PO Box 345
Christchurch 8140

By email: mailroom@ecan.govt.nz

Name of submitter:

Dee and Doug Cotter

225 Connolly Road RD3 Timaru 7973

de.doug@farmside.co.nz

Trade competition statement:

1. We could not gain an advantage in trade competition through this submission.

Proposal this submission relates to is:

2. This submission is on proposed Plan Change 7 to the Canterbury Land and Water Regional Plan (PC7). Specifically the Orari-Temuka-Ophie-Pareora (OTOP) sub-region component of PC7, comprising "Part B" (Proposal).

The specific provisions of PC7 that this submission relates to:

3. This submission is confined to matters in relation to the Levels and Seadown F area in the Timaru Freshwater Management Unit (FMU).

Submission

5. We are a family owned Dairy Farm milking 410 cows on 140Ha in the Mt. Protection zone in Seadown. We employ 3 fulltime staff who are all contribut members of the community, along with ourselves. We feel if these plans were implemented, we will not be financially viable and we will have no choice but to reduce our staff and reduce the stock number as we will have further water restrictions and stock restrictions. We have always farmed in a way that is environmentally sustainable with low stocking rate and pride ourselves on leaving the soil and water better state year on year. We have planted 1000's of plants and have retired areas of our land to riparian areas/plantings. Our last two FEP audits have been a B+ and our farm is now certified, with moisture monitoring. We are very efficient with our water use, as why would we waste money on power, maintenance and lost nutrients to over watering. We have really struggled to get our questions answered by through the meetings run and trying to contact them directly.
Decisions sought by the submitter:

4. We seek the following decisions from Environment Canterbury:

4.1 that the decisions sought in Annexure A to this submission be accepted and/or

4.2 alternative amendments to the provisions of PC7 to address the substance of the concerns raised in this submission; and

4.3 all consequential amendments required to address the concerns raised in submission and ensure a coherent planning document.

Wish to be Heard:

5. We wish to be heard in support of this submission.

6. We would be prepared to consider presenting a joint case with others making similar submissions at the hearing.

Dee and Doug Cotter

Date: 13 September 2019
<table>
<thead>
<tr>
<th>Section &amp; Page No.</th>
<th>Sub-section/ Point</th>
<th>Oppose/ Support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 14.1A</td>
<td>Definitions</td>
<td>Oppose in part</td>
<td>A Mataitai Protection Zone has been identified that is a substantial portion of the Leves and Seadown Plains Area. We recognize and are supportive of the catchment cultural importance however, we are seeking a clear explanation on the values of the Mataitai Protection Zone and whether the explanation in the Ngai Tahu section of the LWRP, page 22 is also an appropriate explanation for this Zone in PC7.</td>
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<tr>
<td>Section 14.1A</td>
<td>Definitions</td>
<td>New Definition</td>
<td>We are looking at all options for mitigating the effects of minimum flows in our area. Augmentation of the Seadown Drain could be an option. Therefore, the plan needs to allow for this.</td>
</tr>
<tr>
<td>Section 14.4</td>
<td>Policies</td>
<td>New Policy</td>
<td>We are looking at all options for mitigating the effects of minimum flows in our area. Augmentation of the Seadown Drain could be an option. Therefore, the plan needs to allow for this.</td>
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<tr>
<td>Section 14.5</td>
<td>Rules</td>
<td>New Rules</td>
<td>We are looking at all options for mitigating the effects of minimum flows in our area. Augmentation of the Seadown Drain could be an option. Therefore, the plan needs to allow for this.</td>
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</table>

(3) We seek the following decisions from Environment Canterbury:

- Clarification on whether the Mataitai Protection Zone as explained on page 22 of the LWRP is an appropriate explanation for this Zone in PC7 and determine if this needs to be included in a definition within this section of the plan.
- Augmentation means the discharge of water the Seadown Drain for the primary purpose of improving flows and/or water quality.
- Improve water quantity and/or quality by facilitating the augmentation of the Seadown Drain.

The discharge of water into the Seadown Drain for augmentation purposes, is a restricted discretionary activity, provided the following conditions are met:

1. The activity does not take place on land that is listed as an archaeological site; and
2. The activity is not within a Community Drinking Water Protection Zone as defined in Schedule 1; and

...
with the application for resource consent; and

5. The discharge does not result in the erosion of the bed or banks of any receiving waterbody.

The exercise of discretion is restricted to the following matters:

1. The appropriateness of the location of the discharge points.
2. The content and quality of the management plan, and the methods proposed to:
   a. monitor and report on the discharges to the drain; and
   b. manage the timing of the discharge to the drain; and
3. The appropriateness of integration with existing or planned infrastructure and water conveyance systems; and
4. Effects on people and property arising from raised groundwater levels and reduced drainage capacity in the drainage system; and
5. Effects on water quality in Washdyke Lagoon and significant habitats of indigenous flora and fauna; and
6. Effects on sites or areas of wāhi tapu, wāhi taonga or mahinga kai; and
7. The potential benefits of the activity to the community and the environment; and
8. Effects on Ngāi Tahu cultural values; and
9. The rate and volume of the discharge.

The discharge of water into Seadown Drain for augmentation purposes that does not meet one or more of the conditions of Rule XXX is a discretionary activity.
<table>
<thead>
<tr>
<th>Section 14.6.2 Environment Flow and Allocation Regimes</th>
<th>Table 14(z) - Timaru Freshwater Management Unit Environment Flow &amp; Allocation Regimes</th>
<th>Oppose</th>
<th>Seadown Drain is managed by ECAN for drainage and flood protection purposes. This means that it is subject to, for example, regular weed clearing. The amount of weed growth in the drain affects the measured flow as it impacts the water level in the drain. An assessment was completed for water users in the catchment by Ryder Consulting. This report suggested that the drain would be better managed by a water level rather than a flow. We know that this would not usually be a way of managing a water body but considering that the drain is not a normal waterbody, this made sense. The report also suggested that the flow equivalent of the level was 100 L/s. We therefore believe that the current minimum flow of 150 L/s should be amended.</th>
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<tr>
<td>14.6.3 Groundwater Allocation ZoneLimits</td>
<td>Table 14(zb) - Orari Temuka Ophit Pareora Groundwater Limits</td>
<td>Oppose in part</td>
<td>There is no T allocation block proposed for the Levels Plains Groundwater Allocation Zone. Having an option to transfer surface takes or hydraulically connected groundwater should be an option for this zone given that there will be many more users subject to a minimum flow than before.</td>
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<td>Change Table 14(z) to a minimum flow of 150 L/s with partial restrictions commencing at a flow of 150 L/s.</td>
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<td>Amend Table 14(zb); for the Levels Plains Groundwater Allocation Zone to an A allocation limit of 22.9 million cubic metres per year and a T allocation limit of 10 million cubic metres per year, while retaining the total allocation for the zone of 32.9 million cubic metres per year.</td>
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