

**From:** [Gael Williams](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission on proposed plan 7 change  
**Date:** Friday, 13 September 2019 2:47:30 PM  
**Attachments:** [PC7 submission for D.G Williams \(002\).docx](#)

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**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:**

- 1 Name: David & Gael Williams  
Address: 231 Opuha Dam Road, RD 17, Fairlie 7987  
Contact: David Williams  
Email: tepuni@yahoo.co.nz

**Trade competition statement:**

- 2 David & Gael Williams could not gain an advantage in trade competition through this submission.

**Proposal this submission relates to is:**

- 3 This submission is on proposed Plan Change 7 (PC7) to the Canterbury Land and Water Regional Plan (PC7).

**Wish to be Heard:**

- 4 We wish to be heard in support of this submission.  
5 We would be prepared to consider presenting a joint case with others making similar submissions at the hearing.

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**David Williams**

Date: 13 September 2019

## **Submission**

### Background

This submission is written on behalf of Tepuni Partnership who have farmed on part of the property for 92 years, and the rest for 20 years since the inception of the Opuha Dam.

Te Puni borders Lake Opuha and we have come to eat, sleep, breath and wash in it to maintain our farming entity. We have had to protect ourselves and our communities involvement through this time as good and bad outcomes and insinuations have taken place.

If some of the outcomes suggested in PC7 were true we would have been dead long ago. We have embraced the challenge for ourselves, our family and the local community.

### **Opihi River Mainstem flow regime**

We are shareholders in Opuha Water Ltd and have invested in the scheme to improve our property to give a better bottom line to improve our sustainability and viability, and enable us to give back to our community and provide for future generations.

Our 2500 hectare property has been stocked reasonably conservatively but in good farming practice with being mindful and observing local monitor groups. Especially the period when the monitor farm (Beef & Lamb NZ) ran its course on the neighbouring property of the Andersons.

The outcome we are seeking through PC7 is a sustainable future for our family and community

One of the keys to this is to enable an adaptive management regime that can be implemented in water short periods that takes into account the state of snow pack, inflows and lake levels.

While I recognise that such a regime has been provided for in PC7, I have concerns about the detail of the proposed regime, namely;

1. That the regime limits the opportunity to be proactive in water short events, delaying the opportunity for intervention;
2. That the reductions in river flows from implementing level one or level two regimes won't go far enough in terms of making meaningful water savings;
3. That the irrigation restrictions deviate too far from the current restriction regime, are too harsh and fail to recognise the benefits of the irrigator-funded Opuha Dam;
4. That OEFRAG is absent from PC7. OEFRAG has had a huge role in ensuring the effective management of the Opihi catchment in dry periods, due to its breadth of local knowledge and experience and needs to have a continued role.

As a neighbouring property, I have been able to observe what a big asset the Opuha Dam is to the community. It brought the local community up off its knees from the 80s and early 90s, to a place the community comes from far and wide to enjoy 365 days a year. The community has also invested time and money to make this a go-to place for their recreation through all types of seasons and at all times of the year.

The PC7 proposal I consider is not a good outcome

- a) From a water quality perspective

b) For a recreational facility perspective

It is not just irrigators and the environment that will be impacted should there be an increase in the frequency of times that the lake level is lowered beyond a usable state, as a result of the PC7 regime. An example of this is in 2015/16 in a water short period, when the biggest complaint about the rapidly draining lake came from the local rowing clubs, who use Lake Opuha as a major training facility.

During this water short period, an adaptive management process was worked through by all key stakeholder groups who offered advice to ease the tensions in the community. The all-important involvement of these groups having a big input into the decisions, helped to alleviate the stress in the community. A thing that I have observed in my experience with the Rural Support Trust is their workload increases in times of adversity.

The community enjoy the facility for better if we are conserving and making an effort, not always getting it right, but trying for the best outcome with regard to lake level, and most importantly with water quality in trying to provide a good habitat for indigenous freshwater species, freshwater bathing sites and good cultural outcomes.

I would like to record my support for the proposals put forward by the Adaptive Management Working Group, as an alternative to the Plan Change 7 provisions.

### **High Nitrogen Concentration Areas**

As for the high nitrate areas I don't consider enough investigation has been carried out as many of the areas it seems to me are basically done as a snapshot and the outcome to be used in argument to favour the writers of this report.

I understand that the percentage reductions for high nitrate concentration areas have been identified as a result of modelling. I would argue that we should be seeing what GMP does first to nitrate concentrations in groundwater sampling, and then deciding if further reductions are warranted.

### **High P Runoff Risk Zone**

The High Phosphorus Runoff Risk Zone also has been carried out in much the same way with the evidence gathered in a very short snapshot with only a partial percentage been used for the suggested purpose.

### **Summary**

In summary, as a person and their family seeing everything unfold, and every stone turned on the Opuha scheme, I would like to express my support for OEFRAG and the proposals put forward by the Adaptive Management Working Group, as to be fair to all users, recreationalists, iwi and the people who made it possible, the irrigators. Irrigators have, over time, adopted an adaptive management approach involving the rest of the community to steer the system through its highs and lows with no financial input from these other parties.

I applaud the community for the way they use the facility that we have on our own back doorstep through all the times of the year, with its highs and lows. The success of the Opuha Dam has been the involvement of its community.

**I seek the following decisions from Environment Canterbury:**

- Adopt the decisions sought by the Adaptive Management Working Group in their submission to Plan Change 7.
- Delete the requirement for % reductions in N loss in High Nitrogen Concentration Areas, until the full effects of farming at GMP baseline are understood
- Remove the requirement for farmers to require resource consents if they have over 20ha winter grazing in a High P Runoff Risk Area, until the full effects of farming at GMP are understood.

