

Submission on Plan Change 7 to the Canterbury Land and Water Regional Plan

By **Deans, C**

Submitter Identification number: **PC7-494**

Wishes to be heard: **Yes**

Would consider making a joint submission at the hearing: **Yes**

Submitted on: **01/09/2019** and **08/09/2019**

This submission was submitted via Environment Canterbury's online submission portal. The Submissions portal generates pdf files of submissions (as attached). However, some of the information that appears in the pdf files is not consistent with information the submitter entered into the portal, specifically, where submitters have ticked:

- "I wish to be heard in support of my submission" ; and
- "If others make a similar submission I will consider presenting a joint case with them at a hearing".

Additionally, the submissions portal has generated submitter and submission point numbers that are not consistent with the numbering applied in the Summary of Decisions Requested. Submission points in the Summary of Decisions Requested (SODR) are numbered using the following format:

PC7 – Submitter ID #.Submission point #

The correct submitter identification number and submitter information is specified above. This will be the number referred to in the SODR.

Proposed Plan Change 7 to the Land and Water Regional Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando
Date received 1/09/2019 9:32:47 AM
Submission #12

Address for service:

Deans Crispin / 12
Homebush RD1 Darfield 7571
Phone: 0210304086
Email: crispin@homebush.net
Wishes to be heard? No
Is willing to present a joint case? No

Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).

- Could you gain an advantage in trade competition in making this submission?
 - No
- Are you directly affected by an effect of the subject matter of the submission that
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition
 - Yes

Submission points

Point 12.1

Submission

1. Plan change 7 uses the term 'spring fed plains stream' widely throughout the document.
2. In some cases the document refers to 'spring fed plains streams' that are marked in hill country and are not fed by springs.
3. These streams are in many cases refer in reality to the bottom of gullies that carry water during rainfall events.
4. Plan change 7 is a good time to remediate this error and mark these hill country gullies correctly.
5. I submit that ECAN should validate all streams marked as spring fed plains streams are what they say they are and change the classification if they are not.

Relief sought

Where hill country gullies are incorrectly classified as spring fed plains streams this must be changed through out the land and water regional plan.

Section: General

Sub-section: General

Provision

General

Proposed Plan Change 7 to the Land and Water Regional Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando
Date received 8/09/2019 8:48:07 PM
Submission #41

Address for service:

Deans Crispin / 41
Homebush RD1 Darfield 7571
Phone: 0210304086
Email: crispin@homebush.net
Wishes to be heard? No
Is willing to present a joint case? No

Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).

- Could you gain an advantage in trade competition in making this submission?
 - No
- Are you directly affected by an effect of the subject matter of the submission that
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition
 - Yes

Submission points

Point 41.1

Submission

1. The term pugging is used throughout the plan change 7 documentation.
2. The term pugging is not adequately described or defined within the documentation.
3. Without a clear definition the term pugging may be applied subjectively on a case by case basis by compliance staff.
4. This submission is that pugging must be clearly defined in the plan change 7 documentation.

Relief sought

The term pugging must be clearly defined. Pugging by an animal should relate to where an animals hooves have gone deeper into the ground than the height of the hoof. This would exclude soil pushed up as a result of the hoof going into the ground. Any lesser imprint than a hoof depth would be defined as a hoof-print.

Where pugging is used in relation to soil loss to rivers, the rules should make it clear that the pugging is not acceptable only when it causes soil to be directly lost into the river bed.

The rules should make it clear that shingle in river beds cannot be pugged as it does not lead to soil loss. That is, the disturbance of shingle by animals is not pugging.

Section: General

Sub-section: General

Provision

General

Proposed Plan Change 7 to the Land and Water Regional Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando
Date received 8/09/2019 9:18:47 PM
Submission #43

Address for service:

Deans Crispin / 43
Homebush RD1 Darfield 7571
Phone: 0210304086
Email: crispin@homebush.net
Wishes to be heard? No
Is willing to present a joint case? No

Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).

- Could you gain an advantage in trade competition in making this submission?
 - No
- Are you directly affected by an effect of the subject matter of the submission that
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition
 - Yes

Submission points

Point 43.1

Submission

My family farm at a property called Homebush in the Malvern Hills, and have done so since the 1850's. The Plan Change 7 documentation has incorrectly identified our property as having spring fed plains streams on it. From ground level there are no stream beds where these lines have been marked on the planning maps, and there are no springs at the uphill point of the marked lines.

The ground covered by these lines is, generally speaking, the bottom of gullies and best described as wet pasture, in that when there is rainfall the bottom of the gully carries water. In some cases this has marked a channel when a lot of water moves in a high rainfall event but this channel is dry for the majority of the year.

I note that similar hills surrounding our farm do not have their gullies marked a spring fed plains streams but as hill fed streams. I submit that there must be an issue with the methodology in the description of the gullies on our property that needs to be rectified before the plan is published.

Relief sought

Within the planning maps for plan change 7, for the streams marked on the attached map these must be re-classified as hill-fed lower rather than spring fed plains streams.

Section: Section 5 Region-wide Rules

Sub-section: Section 5 Region-wide Rules

Provision

General