

From: [Roger Hamilton](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Subm
Date: Friday, 13 September 2019 11:20:14 AM

Hello ECan,

Please receive my submission on the above .

Thank

Kind Regards
Roger Hamilton
25 Rydal St
Christchurch 8025

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

FOR OFFICE USE ONLY

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

Submitter ID:

File No:

Return your signed submission by 5.00 pm 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: <u>Roger Hamilton</u>	Phone (Hm): <u>03 942 4619</u>
Organisation*: <u>Private Individual</u>	Phone (Wrk): <u>027 307 0466</u>
* the organisation that this submission is made on behalf of	
Postal Address: <u>25 Rydal Street</u>	Phone Cell: _____
<u>Christchurch 8025</u>	Postcode: <u>8025</u>
Email: <u>rbhamilton@gmail.com</u>	Fax: _____
Signature: <u>R. B. Hamilton</u>	Date: <u>13-9-2019</u>
Contact name and postal address for service of person making submission (if different from above): _____ <u>n/a</u>	
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:	
<input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission; or	
<input type="checkbox"/> I could gain an advantage in trade competition through this submission.	
If you have ticked this box please select one of the following:	
<input type="checkbox"/> I am directly affected by an effect of the subject matter of the submission	
<input checked="" type="checkbox"/> I am not directly affected by an effect of the subject matter of the submission	
Signature: <u>R. B. Hamilton</u>	Date: <u>13-9-19</u>
(Signature of person making submission or person authorized 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.	

- | |
|--|
| <input checked="" type="checkbox"/> I do not wish to be heard in support of my submission, or |
| <input type="checkbox"/> I do wish to be heard in support of my submission; and if so, |
| <input type="checkbox"/> I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing |

I consider that the consultation documents and process for Plan Changes 2 and 7 to be inadequate, and therefore the process should be halted and the Plan Changes resubmitted for consultation.

The danger to clean water in Christchurch of nitrates leeching into the water systems is difficult to understand, and there has not been adequate public discussion of the dangers and possible solutions: *the consultation documents are inadequate for this purpose.* Affected communities cannot be said to have been involved in the process as required by the Canterbury Water Management Strategy.

I oppose in principle the proposed changes that will allow an increase to the acceptable levels of nitrate-N within the Christchurch aquifer system.

Effects of increased nitrate concentrations

Elevated nitrate concentrations affect the health of people. High nitrates in drinking water can cause blue baby syndrome which may result in death. It also increases instances of colorectal cancer.

Nitrates are toxic to aquatic animals at much lower concentrations than they are to humans. Increasing nitrate concentrations will decrease the amount of suitable available habitat for our aquatic species. This will impact on biodiversity and recreation values. Single cell organisms right up to complex fish species support water ecosystems through water purification. Increasing nitrate concentrations in our groundwater and contamination of Christchurch's aquifers could result in potentially significant health, economic and environmental effects

The obligations of decision makers

As a UN member, New Zealand is signatory to its declarations and is expected by the New Zealand people and the global community to adhere to UN principles. Under the Resource Management Act, Environment Canterbury has delegated authority to act on behalf of the government to protect our natural resources and is obligated to act in accordance with these same principles.

Key among the UN principles is the Precautionary Principle. When there is reasonable suspicion of harm, decision-makers need to apply precaution and consider the degree of uncertainty that appears from scientific evaluation.

There is an ever-increasing understanding of, and evidence recognising the negative impacts caused by elevated nitrate concentrations.

Principle 15 of the 1992 Rio Declaration states that where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

Thus, the uncertainty associated with the limits at which the effects of nitrate are harmful is irrelevant. Action must be undertaken to ensure water remains safe for our society and environment.

- No one has the right to destroy the pure aquifer that run under Christchurch - ECAN's business is to protect public water.*
- The health & environmental costs of this are massive and financial costs of it fall on the Christchurch people - why should the benefit of a few override those of a considerably larger population base of a few override those of a considerably larger population base. This is unjust to say nothing of being unsustainable healthwise long term.*

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)
Section & Page Number	Sub-section/Point	Oppose/support (in part or full)	Reasons	
8.5.21 P 80		Oppose	Placing no restrictions on land uses below 5 ha ignores the cumulative effects of unregulated activities	Remove rule
8.5.22 P 80		Oppose	Does not apply the precautionary principle	Apply the most restrictive values to land within part of a subarea, or across subareas
8.5.23 p 80		Oppose	As above	As above
8.7.3 P 93	Table 8-5	Oppose in part	Oppose limits and target that seek to merely meet the minimum bottom line. We should be	Set a minimum target values that reflect a precautionary approach to human and ecological

From: [Alanna Hollier](#)
To: [Tavisha Fernando](#)
Subject: FW: Submission enlargement - Roger Hamilton
Date: Monday, 7 October 2019 10:31:54 AM

From: Roger Hamilton <rbhamilt@gmail.com>
Sent: Thursday, 3 October 2019 1:25 PM
To: Alanna Hollier <Alanna.Hollier@ecan.govt.nz>
Subject: Submission enlargement - Roger Hamilton

Hello Allana,

Thanks for the call a wee while ago.

I have blown up the submission, and it is now on 4 pages, hopefully so you can read it.

Thanks very much,

Kind Regards

Roger Hamilton

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Signature: R. B. Hamilton Date: 13-9-19
(Signature of person making submission or person authorised to sign on behalf of person making the submission)

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