

**From:** [Carey Barnett](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 LWRP Further Submission - Ellesmere Sustainable Agriculture Inc  
**Date:** Thursday, 5 December 2019 12:09:03 PM  
**Attachments:** [Cover letter for fur subs PC7 031219.pdf](#)  
[ESAI fur sub PPC7 final CLWRP 191119.pdf](#)  
[ESAI fur sub PPC7 CLWRP 191119.doc](#)

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Hello

Please find attached further submissions on Plan Change 7 to the Canterbury Land and Water Regional Plan from Ellesmere Sustainable Agriculture Inc. A hard copy will be posted. Please send me a response email recognising receipt of this further submission.

Kind regards  
Carey Barnett

***Environmental Advisor***

Ellesmere Sustainable Agriculture Inc  
0274888055

**ELLESMERE SUSTAINABLE AGRICULTURE INCORPORATED**

c/- Ms C M Barnett  
Lakeside, R D 3, Leeston 7683  
Ph: 03 3243429  
Mobile: 0274888055  
Email: [carey.barnett@xtra.co.nz](mailto:carey.barnett@xtra.co.nz)

5 December 2019

Environment Canterbury  
P O Box 345  
**CHRISTCHURCH 8140**

**ATTENTION: CUSTOMER SERVICES**

Dear Sir/Madam

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

Please find attached further submissions on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan from Ellesmere Sustainable Agriculture Incorporated.

If you have any queries regarding the attached information then please do not hesitate to contact Ms Carey Barnett – phone 0274888055.

Yours faithfully

**ELLESMERE SUSTAINABLE AGRICULTURE INCORPORATED**

A handwritten signature in blue ink, appearing to read 'C.M. Barnett', is written over a light blue rectangular background.

C M Barnett  
**Environmental Advisor**

Submitter ID:

File No:

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

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by **5.00pm 6 December 2019** to:

Customer Services  
Environment Canterbury  
P O Box 345  
Christchurch 8140

or

by email to [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)  
with "Plan Change 7 LWRP Further Submission"  
in the subject line

**Full Name:** Ellesmere Sustainable Agriculture Incorporated \_\_\_\_\_ **Phone (Hm):** 3243429 \_\_\_\_\_  
**Organisation\*:** Ellesmere Sustainable Agriculture Incorporated \_\_\_\_\_ **Phone (Wk):** 0274888055 \_\_\_\_\_  
\* the organisation that this submission is made on behalf of  
**Postal Address:** c/- Carey Barnett, 271 Harts Road, Lakeside, R D 3, \_\_\_\_\_ **Phone (Cell):** 0274888055 \_\_\_\_\_  
Leeston \_\_\_\_\_ **Postcode:** 7683 \_\_\_\_\_  
**Email:** carey.barnett@xtra.co.nz \_\_\_\_\_ **Fax:** \_\_\_\_\_  
**Contact name and postal address for service of person making submission** (if different from above):  
\_\_\_\_\_  
\_\_\_\_\_

**Only certain people can make further submissions. Please tick the option that applies to you:**

- ☐ I am a person representing a relevant aspect of the public interest; or  
☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or  
☐ I am the local authority for the relevant area.

- ☐ 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 your submission in a joint case with others making a similar submission at any hearing

### **Service of your further submission:**

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**Signature:**



**Date:** 4 December 2019

(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

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(4) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
<i>Name &amp; postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Note Allow or disallow</i>
<b>General Support</b>			
<b>Beef and Lamb New Zealand</b> PO Box 39085, Christchurch 8545 Attention: Lauren Phillips <a href="mailto:lauren.phillips@beeflambnz.com">lauren.phillips@beeflambnz.com</a>	PC7-214.153 Support points 8, 10 and 11	Ellesmere Sustainable Agriculture Inc (hereafter referred to as 'ESAI') supports points 8, 10 and 11 as they encourage the support of all wellbeings, flexibility, innovation in business, land use activities, environmental protection and the initiation and operation of catchment groups. Provisions must allow for catchment level application and considerations and the use of non-regulatory means to achieve better outcomes for all.	Allow points 8, 10 and 11.
<b>Beef and Lamb New Zealand</b>	PC7-214.154 Support Points 8 and 9	ESAI strongly supports catchment and farm specific treatments and principles that are best dealt with through Farm Environment Plans and is opposed to prescriptive input type rules and standards. Prescriptive and input type provisions are difficult to implement and often lead to unsuitable outcomes for all parties and situations. It is essential that mitigations are specific to each farm and are flexible to foster future on-farm aspirations as well as the environment.	Allow points 8 and 9.
<b>Allocation of Resources</b>			
<b>Water and Wildlife Habitat Trust</b> 61 Andover St, Merivale, Christchurch 8014 Attention: Mike Patchett <a href="mailto:dandmpatchett@xtra.co.nz">dandmpatchett@xtra.co.nz</a>	PC7-88.112 General Allocation and Limits Oppose	ESAI opposes further lowering of surface and groundwater allocations in the Selwyn Waihora catchment as there are already measures in place to deal with allocation in this area. Significant consultation with many interested parties was undertaken to get to this point. Land and water users in this catchment have undertaken significant changes since these provisions have been implemented and improvements are already being observed.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.113	ESAI opposes the reduction or any further reduction of surface and	Disallow.

<b>Water and Wildlife Habitat Trust</b>	General Allocation and Limits Oppose  PC7-88.94 General Allocation and Limits Oppose	groundwater allocations as proposed given the provisions that are already in place and the work that is being done already in the Selwyn Waihora catchment. The reductions proposed in this submission are not economically or socially viable.  Reasons as per above.	Disallow.
<b>Water Quality - Allocation</b>			
<b>Beef and Lamb New Zealand</b>	PC7-214.152 Support Principles 7 and 8 of submission point  PC7-214.152 Support Principle 14 of submission point	ESAI support Principles 7 and 8 in their entirety. The setting of appropriate time frames and catering for long term investment certainty are key principals that need to be recognised in setting allocation limits and provisions.  ESAI supports and agrees with Principle 14 in its entirety.	Allow Principles 7 and 8.  Allow Principle 14.
<b>Stock Exclusion from Waterways</b>			
<b>Water and Wildlife Habitat Trust</b>	PC7-88.45 Oppose	ESAI does not support mandatory setbacks and fencing of waterways for stock exclusion based on the variety of characteristics of each individual farm and catchment. Determining appropriate distances and, if required at all, is best dealt with through Farm Environment Plan treatments/programmes.	Disallow.
<b>Winter Grazing</b>			
<b>Ardleigh Deer Farm</b> Ben Hudson <a href="mailto:ardleighfarm@hotmail.com">ardleighfarm@hotmail.com</a>	PC7-242.2 Oppose	ESAI opposes the insertion of mandatory areas or percentages of property provisions for winter grazing. These do not work in practice and are better managed through Farm Environment Plans and/or nutrient management provisions.	Disallow.
<b>Minimum Flows</b>			
<b>Sustainable Otautahi Christchurch -</b> PO Box 17727, Sumner, Christchurch	PC7-420.4 Oppose	ESAI considers where limits have already been set within the Selwyn Waihora Zone after considerable consultation and a	Disallow.

8840 Attention: Colleen Philip <a href="mailto:info@sustainablechristchurch.org.nz">info@sustainablechristchurch.org.nz</a>		previous Variation to the Canterbury Land and Water Plan that these should be respected and retained within the Plan as currently set.	
<b>Waipuna/Springs</b>			
<b>Te Runanga o Arowhenua and Te Runanga of Ngai Tahu</b> c/- Aoraki Environmental Consultancy Ltd Attention: Kylie Hall <a href="mailto:kyliehall@aecltd.co.nz">kyliehall@aecltd.co.nz</a>	PC7-424.200 Support in part	ESAI considers that waipuna/spring protection is best dealt with by the regional authority and as part of management under Farm Environment Plans where they relate to agricultural land uses. Regulation beyond regional authority entities is not supported by ESAI and results in 'double handling' of the same issues with further money spent in regulation rather than 'on-the-ground' enhancement.	Allow in part.
<b>Habitats of Indigenous Species</b>			
<b>Water and Wildlife Habitat Trust</b>	PC7-88.20 Oppose in part	ESAI acknowledges and respects the need to protect indigenous species and their habitats but is concerned with how these areas have been mapped, how the areas have been determined and the lack of consultation with affected parties on adjoining land. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	Disallow.
	PC7-88.23-27, 30,35 Oppose	For reasons set out above and because there are already provisions in place in the Selwyn Waihora zone that adequately deal with the concerns raised by the submitter. ESAI and other catchment groups in this area work with various entities including Environment Canterbury, Selwyn District Council and iwi in relation to many different restoration projects. In our experience these projects work best outside of regulatory frameworks.	Disallow.
<b>Selwyn District Council</b> PO Box 90, Rolleston 7643 Attention: Ben Rhodes <a href="mailto:Benjamin.Rhodes@selwyn.govt.nz">Benjamin.Rhodes@selwyn.govt.nz</a>	PC7-300.4 Support	ESAI supports the removal of areas of Indigenous Freshwater Species Habitat on the planning maps where watercourses that are no longer operational and are closed are not captured.	Allow.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Baseline commercial vegetable growing area</b>			
<b>Ellesmere Sustainable Agriculture Inc</b>	PC7-207.6	ESAI supports this submission and requests that clarification	Allow.

c/- C M Barnett Lakeside, R D 3, Leeston 7683 carey.barnett@xtra.co.nz	Support	provisions be inserted to allow operators to choose which type of operation and the relevant rules they wish their operation to be considered under.	
<b>Horticulture New Zealand</b> PO Box 10-232 Wellington Attention Rachel McClung <a href="mailto:rachel.mcclung@hortnz.co.nz">rachel.mcclung@hortnz.co.nz</a>	PC7-356.1 Oppose in part	ESAI is concerned about the insertion of the wording “production, including the full sequence of crops and pasture used as part of a rotation”. This could have ramifications for mixed farming types where the commercial vegetable production component makes up only a small part of the overall farm and could result in difficulties in determining whether consents are required and/or what provisions apply. ESAI supports pre-hearing caucusing in order to further refine these related provisions.	Disallow in part.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Indigenous Freshwater Species Habitat</b>			
<b>Beef and Lamb New Zealand</b>	PC7-214.4 Support in part	ESAI supports the proposed amendments provided that these areas not inserted into the planning maps without scientific surveys being done. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	Allow provided other changes are made.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Low Intensity Horticulture</b>			
<b>Horticulture New Zealand</b>	PC7-356.10 Oppose in part	ESAI is concerned that the proposed new definition will further complicate when and where the definition will apply in relation to arable and/or mixed farming units. ESAI supports pre-hearing caucusing in order to further refine these related provisions.	Disallow until clarity is provided.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Vegetation Clearance</b>			
<b>Department of Conservation</b> Private Bag 4715 Christchurch Mail Centre 8140 Attention: Geoff Deavoll <a href="mailto:gdeavoll@doc.govt.nz">gdeavoll@doc.govt.nz</a>	PC7-160.29 Oppose	ESAI opposes the amendment proposed as it is imperative that drains and ponds are clear of obstructive vegetation in order to function properly and maintain functioning environmental areas. To require further regulation again in these areas is inappropriate, inefficient and detrimental to the environment.	Disallow.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Waipuna/Springs</b>			
<b>Te Runanga o Arowhenua and Te</b>	PC7-424.125	The insertion of a new definition is considered beyond the scope of	Disallow.

<b>Runanga o Ngai Tahu</b>	Oppose	the plan change as it is not amending a proposed definition but proposing an entirely new one. Suitable definitions are contained within dictionaries e.g. Concise Oxford Dictionary or Maori language dictionary.	
<b>Section 4– Region-wide Policies</b>			
<b>Water and Wildlife Habitat Trust</b>	PC7-88.12 and 13 Provision 04. Table 1a Oppose	ESAI opposes the amendment of Table 1a as requested. Arbitrary limits without consultation or percentages of areas in a catchment are a 'one size fits all' approach which is not appropriate for the many varied catchments, or parts of catchments in the Canterbury region.	Disallow.
<b>Nga Runanga</b>	PC7-423.12, 13 and 14 Provision 04. Table 1b Oppose	ESAI opposes changes to Trophic levels that were not previously contained in the Canterbury Land and Water Regional Plan and/or the Selwyn Waihora Zone provisions. Trophic levels for these areas were previously and recently set as an outcome of the extensive consultation undertaken in determining these existing provisions. They were determined at a level that was a result of this community consultation. No such consultation or community consideration has been applied to this Plan Change in the areas affected.	Disallow.
<b>Horticulture New Zealand</b>	PC7-356.11 Provision 04.006 Support	ESAI supports the inclusion of the proposed wording to include individual and community rootstock and crop survival water needs as these are all essential requirements to sustain all wellbeings within catchments.	Allow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.48, 50, 56 and 59 Provision 04.031 Oppose	ESAI does not support the additional wording proposed within these submission points. Riparian margins are best addressed on a site by site basis and without mandatory setback distances. It is also inefficient and ineffective to require all intensively farmed stock to be excluded from drains and stream areas as they are an essential management 'tool' in these areas, keeping weeds and fire hazard long grasses in check	Disallow.
<b>Genesis Energy Limited</b> Tokaanu Power Station	PC7-422.12 Provision 4.101	ESAI supports the delay of further considering Policy 4.101 until the details of the values, characteristics and species within each	Allow.



Private Bag 36 Turangi 3353 Attention: Alice Barnett <a href="mailto:alice.barnett@genesisenergy.co.nz">alice.barnett@genesisenergy.co.nz</a>	Support	area of Indigenous Freshwater Species Habitat have been assessed. We do not support the locations of the proposed habitat areas without specific scientific surveys being done. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	
<b>Meridian Energy</b> PO Box 2146 Christchurch 8140 Attention: Andrew Feierabend <a href="mailto:andrew.feierabend@meridian.co.nz">andrew.feierabend@meridian.co.nz</a>	PC7-346.5 Provision 4.101 Support	ESAI supports the proposed wording of the submitter as it provides clearer guidance.	Allow.
<b>As One Incorporated</b> Duncan Cotterill 148 Victoria Street Christchurch 8140	PC7-387.21 Provision 4.103 Oppose	ESAI strongly opposes the proposed amendments by the submitter as water quality data collection relates to the activities of entire catchments not just one entity. Requiring a consent holder to do this individually goes beyond the scope of an individual resource consent in the majority of cases. Environment Canterbury already does substantial water quality collection and analysis within the region.	Disallow.
<b>Region-wide Rules</b>			
<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.184-188 Non-PC7 provisions Rule 05.068, 068A, 068B 05.069 and 05.070 Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.189 Rule 05.071 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.62 and 63 Rule 05.071	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7 and a prohibited	Disallow

	Oppose	status for the activities referred to is considered inappropriate.	
<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.164 Rule 05.114 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Nga Runanga</b>	PC7-423.44 Rule 05.123 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.  ESAI acknowledges and respects the need to protect indigenous species and their habitats but is concerned with how these areas have been mapped, how the areas have been determined and the lack of consultation with affected parties on adjoining land. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	Disallow.
	PC7-423.45 Rule 05.126 Oppose	For reasons set out above.	Disallow.
	PC7-423.46 Rule 05.128 Oppose	For reasons set out above.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.39 Rule 05.161 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7 and a prohibited status for the activities referred to is considered inappropriate.	Disallow.
<b>Schedule 7 – Farm Environment Plan</b>			
<b>Water and Wildlife Habitat Trust</b>	PC7-88.73 Provision 16.07 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.	Disallow.

<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.40 Provision 16.07 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7 and is sufficiently covered in the title of 5E Management Area.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.55, 72, 74, 75, 76, 77, 78, 79, 80,81, 82, 83, 84,85, 86, 87, 88, 89, 90, 91, 92, 93 Provision 16.07 Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Royal Forest &amp; Bird Protection Society Inc</b>	PC7-472.210, 211, 212, 213, 214, 215 Provision 16.07 Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Potatoes New Zealand</b> PO Box 10-232 Wellington Attention: Nicola Loach <a href="mailto:accounts@potatoesnz.co.nz">accounts@potatoesnz.co.nz</a>	PC7- 404.22 Provision 16.07 (As notified in Addendum to the Summary of Further Submissions) Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7. The proposed changes will also further complicate the requirements in mixed farming operations. ESAI supports pre-hearing caucusing in order to further refine these related provisions.	Disallow.
<b>Schedule 8 – Region-wide Water Quality Limits</b>			
<b>Meridian Energy</b>	PC7-346.22 Provision 16.08 Support in part	ESAI supports the insertion of the footnote explaining that Schedule 8 is not relevant in circumstances where Water Quality Limits for Rivers, Lakes and or Groundwater have been set in Sections 6-15B. This is appropriate given the consultation and decisions made recently and previously on these sections of the Plan.	Allow.

Submitter ID:

File No:

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**Full Name:** Ellesmere Sustainable Agriculture Incorporated \_\_\_\_\_ **Phone (Hm):** 3243429 \_\_\_\_\_  
**Organisation\*:** Ellesmere Sustainable Agriculture Incorporated \_\_\_\_\_ **Phone (Wk):** 0274888055 \_\_\_\_\_  
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**Postal Address:** c/- Carey Barnett, 271 Harts Road, Lakeside, R D 3, \_\_\_\_\_ **Phone (Cell):** 0274888055 \_\_\_\_\_  
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**Date:** 4 December 2019

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

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<i>Name &amp; postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Note Allow or disallow</i>
<b>General Support</b>			
<b>Beef and Lamb New Zealand</b> PO Box 39085, Christchurch 8545 Attention: Lauren Phillips <a href="mailto:lauren.phillips@beeflambnz.com">lauren.phillips@beeflambnz.com</a>	PC7-214.153  Support points 8, 10 and 11	Ellesmere Sustainable Agriculture Inc (hereafter referred to as 'ESAI') supports points 8, 10 and 11 as they encourage the support of all wellbeings, flexibility, innovation in business, land use activities, environmental protection and the initiation and operation of catchment groups. Provisions must allow for catchment level application and considerations and the use of non-regulatory means to achieve better outcomes for all.	Allow points 8, 10 and 11.
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<b>Water and Wildlife Habitat Trust</b> 61 Andover St, Merivale, Christchurch 8014 Attention: Mike Patchett <a href="mailto:dandmpatchett@xtra.co.nz">dandmpatchett@xtra.co.nz</a>	PC7-88.112 General Allocation and Limits Oppose	ESAI opposes further lowering of surface and groundwater allocations in the Selwyn Waihora catchment as there are already measures in place to deal with allocation in this area. Significant consultation with many interested parties was undertaken to get to this point. Land and water users in this catchment have undertaken significant changes since these provisions have been implemented and improvements are already being observed.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.113	ESAI opposes the reduction or any further reduction of surface and	Disallow.

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<b>Water and Wildlife Habitat Trust</b>	PC7-88.20 Oppose in part	ESAI acknowledges and respects the need to protect indigenous species and their habitats but is concerned with how these areas have been mapped, how the areas have been determined and the lack of consultation with affected parties on adjoining land. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	Disallow.
	PC7-88.23-27, 30,35 Oppose	For reasons set out above and because there are already provisions in place in the Selwyn Waihora zone that adequately deal with the concerns raised by the submitter. ESAI and other catchment groups in this area work with various entities including Environment Canterbury, Selwyn District Council and iwi in relation to many different restoration projects. In our experience these projects work best outside of regulatory frameworks.	Disallow.
<b>Selwyn District Council</b> PO Box 90, Rolleston 7643 Attention: Ben Rhodes <a href="mailto:Benjamin.Rhodes@selwyn.govt.nz">Benjamin.Rhodes@selwyn.govt.nz</a>	PC7-300.4 Support	ESAI supports the removal of areas of Indigenous Freshwater Species Habitat on the planning maps where watercourses that are no longer operational and are closed are not captured.	Allow.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Baseline commercial vegetable growing area</b>			
<b>Ellesmere Sustainable Agriculture Inc</b>	PC7-207.6	ESAI supports this submission and requests that clarification	Allow.

c/- C M Barnett Lakeside, R D 3, Leeston 7683 carey.barnett@xtra.co.nz	Support	provisions be inserted to allow operators to choose which type of operation and the relevant rules they wish their operation to be considered under.	
<b>Horticulture New Zealand</b> PO Box 10-232 Wellington Attention Rachel McClung <a href="mailto:rachel.mcclung@hortnz.co.nz">rachel.mcclung@hortnz.co.nz</a>	PC7-356.1 Oppose in part	ESAI is concerned about the insertion of the wording “production, including the full sequence of crops and pasture used as part of a rotation”. This could have ramifications for mixed farming types where the commercial vegetable production component makes up only a small part of the overall farm and could result in difficulties in determining whether consents are required and/or what provisions apply. ESAI supports pre-hearing caucusing in order to further refine these related provisions.	Disallow in part.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Indigenous Freshwater Species Habitat</b>			
<b>Beef and Lamb New Zealand</b>	PC7-214.4 Support in part	ESAI supports the proposed amendments provided that these areas not inserted into the planning maps without scientific surveys being done. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	Allow provided other changes are made.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Low Intensity Horticulture</b>			
<b>Horticulture New Zealand</b>	PC7-356.10 Oppose in part	ESAI is concerned that the proposed new definition will further complicate when and where the definition will apply in relation to arable and/or mixed farming units. ESAI supports pre-hearing caucusing in order to further refine these related provisions.	Disallow until clarity is provided.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Vegetation Clearance</b>			
<b>Department of Conservation</b> Private Bag 4715 Christchurch Mail Centre 8140 Attention: Geoff Deavoll <a href="mailto:gdeavoll@doc.govt.nz">gdeavoll@doc.govt.nz</a>	PC7-160.29 Oppose	ESAI opposes the amendment proposed as it is imperative that drains and ponds are clear of obstructive vegetation in order to function properly and maintain functioning environmental areas. To require further regulation again in these areas is inappropriate, inefficient and detrimental to the environment.	Disallow.
<b>Section 2.9 – Definitions, Translations and Abbreviations, 02.09 Waipuna/Springs</b>			
<b>Te Runanga o Arowhenua and Te</b>	PC7-424.125	The insertion of a new definition is considered beyond the scope of	Disallow.



<b>Runanga o Ngai Tahu</b>	Oppose	the plan change as it is not amending a proposed definition but proposing an entirely new one. Suitable definitions are contained within dictionaries e.g. Concise Oxford Dictionary or Maori language dictionary.	
<b>Section 4– Region-wide Policies</b>			
<b>Water and Wildlife Habitat Trust</b>	PC7-88.12 and 13 Provision 04. Table 1a Oppose	ESAI opposes the amendment of Table 1a as requested. Arbitrary limits without consultation or percentages of areas in a catchment are a 'one size fits all' approach which is not appropriate for the many varied catchments, or parts of catchments in the Canterbury region.	Disallow.
<b>Nga Runanga</b>	PC7-423.12, 13 and 14 Provision 04. Table 1b Oppose	ESAI opposes changes to Trophic levels that were not previously contained in the Canterbury Land and Water Regional Plan and/or the Selwyn Waihora Zone provisions. Trophic levels for these areas were previously and recently set as an outcome of the extensive consultation undertaken in determining these existing provisions. They were determined at a level that was a result of this community consultation. No such consultation or community consideration has been applied to this Plan Change in the areas affected.	Disallow.
<b>Horticulture New Zealand</b>	PC7-356.11 Provision 04.006 Support	ESAI supports the inclusion of the proposed wording to include individual and community rootstock and crop survival water needs as these are all essential requirements to sustain all wellbeings within catchments.	Allow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.48, 50, 56 and 59 Provision 04.031 Oppose	ESAI does not support the additional wording proposed within these submission points. Riparian margins are best addressed on a site by site basis and without mandatory setback distances. It is also inefficient and ineffective to require all intensively farmed stock to be excluded from drains and stream areas as they are an essential management 'tool' in these areas, keeping weeds and fire hazard long grasses in check	Disallow.
<b>Genesis Energy Limited</b> Tokaanu Power Station	PC7-422.12 Provision 4.101	ESAI supports the delay of further considering Policy 4.101 until the details of the values, characteristics and species within each	Allow.

Private Bag 36 Turangi 3353 Attention: Alice Barnett <a href="mailto:alice.barnett@genesisenergy.co.nz">alice.barnett@genesisenergy.co.nz</a>	Support	area of Indigenous Freshwater Species Habitat have been assessed. We do not support the locations of the proposed habitat areas without specific scientific surveys being done. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	
<b>Meridian Energy</b> PO Box 2146 Christchurch 8140 Attention: Andrew Feierabend <a href="mailto:andrew.feierabend@meridian.co.nz">andrew.feierabend@meridian.co.nz</a>	PC7-346.5 Provision 4.101 Support	ESAI supports the proposed wording of the submitter as it provides clearer guidance.	Allow.
<b>As One Incorporated</b> Duncan Cotterill 148 Victoria Street Christchurch 8140	PC7-387.21 Provision 4.103 Oppose	ESAI strongly opposes the proposed amendments by the submitter as water quality data collection relates to the activities of entire catchments not just one entity. Requiring a consent holder to do this individually goes beyond the scope of an individual resource consent in the majority of cases. Environment Canterbury already does substantial water quality collection and analysis within the region.	Disallow.
<b>Region-wide Rules</b>			
<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.184-188 Non-PC7 provisions Rule 05.068, 068A, 068B 05.069 and 05.070 Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.189 Rule 05.071 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.62 and 63 Rule 05.071	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7 and a prohibited	Disallow

	Oppose	status for the activities referred to is considered inappropriate.	
<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.164 Rule 05.114 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Nga Runanga</b>	PC7-423.44 Rule 05.123 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.  ESAI acknowledges and respects the need to protect indigenous species and their habitats but is concerned with how these areas have been mapped, how the areas have been determined and the lack of consultation with affected parties on adjoining land. Until such time as these areas have been confirmed through appropriate scientific survey, ESAI cannot support their mapping, location or the associated provisions.	Disallow.
	PC7-423.45 Rule 05.126 Oppose	For reasons set out above.	Disallow.
	PC7-423.46 Rule 05.128 Oppose	For reasons set out above.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.39 Rule 05.161 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7 and a prohibited status for the activities referred to is considered inappropriate.	Disallow.
<b>Schedule 7 – Farm Environment Plan</b>			
<b>Water and Wildlife Habitat Trust</b>	PC7-88.73 Provision 16.07 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7.	Disallow.

<b>Te Runanga o Arowhenua and Te Runanga o Ngai Tahu</b>	PC7-424.40 Provision 16.07 Oppose	ESAI opposes the amendment proposed by the submitter as it is beyond the scope of Proposed Plan Change 7 and is sufficiently covered in the title of 5E Management Area.	Disallow.
<b>Water and Wildlife Habitat Trust</b>	PC7-88.55, 72, 74, 75, 76, 77, 78, 79, 80,81, 82, 83, 84,85, 86, 87, 88, 89, 90, 91, 92, 93 Provision 16.07 Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Royal Forest &amp; Bird Protection Society Inc</b>	PC7-472.210, 211, 212, 213, 214, 215 Provision 16.07 Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7.	Disallow.
<b>Potatoes New Zealand</b> PO Box 10-232 Wellington Attention: Nicola Loach <a href="mailto:accounts@potatoesnz.co.nz">accounts@potatoesnz.co.nz</a>	PC7- 404.22 Provision 16.07 (As notified in Addendum to the Summary of Further Submissions) Oppose	ESAI opposes the amendments proposed by the submitter as they are beyond the scope of Proposed Plan Change 7. The proposed changes will also further complicate the requirements in mixed farming operations. ESAI supports pre-hearing caucusing in order to further refine these related provisions.	Disallow.
<b>Schedule 8 – Region-wide Water Quality Limits</b>			
<b>Meridian Energy</b>	PC7-346.22 Provision 16.08 Support in part	ESAI supports the insertion of the footnote explaining that Schedule 8 is not relevant in circumstances where Water Quality Limits for Rivers, Lakes and or Groundwater have been set in Sections 6-15B. This is appropriate given the consultation and decisions made recently and previously on these sections of the Plan.	Allow.