



Submission on Proposed Canterbury Land and Water Regional Plan

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Submitter ID:

File No: PLAN/LWRP/DRFT/6SU/2

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:

Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: <u>Errol Albert Begg & Marilyn Begg</u>	Phone (Hm): <u>03 3027907</u>
Organisation*: <u>Erralyn Farm Limited</u>	Phone (Wk): _____
* the organisation that this submission is made on behalf of	
Postal Address: <u>695 Acton Road, RD 11,</u>	Phone (Cell): <u>021 878438</u>
<u>Rakaia 7781</u>	Postcode: <u>7781</u>
Email: <u>erralyn@extra.co.nz</u>	Fax: <u>03 3035107</u>
Contact name and postal address for service of person making submission (if different from above): <u>Same as above</u>	

Trade Competition

Pursuant to Clause 6 of 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:

- adversely affects the environment; and
- does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I could not gain an advantage in trade competition through this submission; or
 I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

- I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
 I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature: E A Begg Marilyn Begg Date: 4/10/2012

(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.

- 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,
 If others make a similar submission, I will consider presenting a joint case with them at the hearing.

Submission on the Proposed Canterbury Land and Water Plan: Erralyn Farm Ltd.

(Submitted 4 October 2012 and amended 22 Nov 2012 at Ecan 's request, to reflect the August version of the Plan rather than the 11 June version.)

(1) The specific provisions of the Proposed Plan that my submission relates to are		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		(3) I seek the following decisions from Environment Canterbury: <i>(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).</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
4-9	4.34	Oppose	These two policies appear to be inconsistent	Needs to be clarified what the intention is. 4.34 has 'and' where 4.31 has 'or'
4-7	4.31	Oppose	As above	
4-9	4.38	Oppose	It is not clear how this will be achieved across the catchment. How will individual contributions to any exceedence be assessed	More work/consultation needed on how this will work
4-14-15	4.87, 4.89	Oppose	Who will be the judge of any alleged effects?	As above. There is considerable uncertainty here, first of all as to where the river bed is, and then as to causation for any alleged effects.
Farming				
5-11	5.39 through 5.51			
5-11	5.39	Oppose in part	The OVERSEER model may be superseded. It is not currently useful for arable /mixed use.	The wording should say 'or equivalent'. Better science is needed, and needs to be promulgated more proactively.
5-12	5.42	Oppose in part	As above. Also, Schedule 7, at 4 (f) (i) 'user defined measurable targets': this is a big ask. Considerable science is involved, are there enough qualified farm advisors to assist with these FEPs. How much will all of this cost?	This may need to be a cooperative effort between farmers and companies who do business with them. Farmers do not have the experience to do this on their own.
5-13	5.45	Oppose	Non-complying is too strict a classification	Needs clarification of 'new activity'
	5.46	Oppose	Schedule 8 is unknown. 5.46 (4) seems	How are the Schedule 8 rates being

			redundant as FEPs are required as of now.	calculated?
	5.49	Oppose	As above, should not be non-complying	Restricted discretionary would allow case by case, and more creative solutions to solving the problem
Structures				
5-26 to 5-28	5.112 through 5.121	Oppose	The bed of a river is not sufficiently defined	Rules are proposed in a very poorly defined area. Farming takes place all along the sides of rivers, often on freehold land. What is the extent of riverbed? Much more clarity is needed, or a proper process (communication, site visits, and agreement) for dealing with such cases.
	5.116	Oppose	Farmers should also be allowed to install and maintain flood protection works on the same basis, in accordance with an approved plan.	Much more consultation needed with land owners where flood protection work is undertaken by local authorities. Consultation needs to be a requirement in rule 5.116
Vegetation				
5-32	5.143 through 5.146	Oppose	Schedule 14 is very difficult to navigate. 5.143(3): vegetation is sometimes used in flood protection works; 5.143 (8): historically landowners have worked with authorities, and should continue to be involved	Schedule 14 should be available as a map, with areas clearly defined. Consultation with landowners should be a requirement in the rules.
Gravel				
5-29	5.124 through 5.127	Oppose	Prevents normal farm work; volumes are not realistic. Should not need to get a resource consent above this very restrictive rule.	Revisit volumes and purpose of rule
Earthworks				
5-33 to 5-34	5.147 through 5.149	Oppose	Difficult to understand, adds complexity to normal farm work	Revisit purpose of rule. Where are the guidelines referred to ?
Clearance				
5- 34 to 5-36	5.150 through 5.154	Oppose	Adds unnecessary complexity to farm work	Needs simplifying. Where are the guidelines referred to?

Related concerns

- Farmers will not be able to develop undeveloped land into productive farm land in future (nutrient limits, clearance and vegetation rules)
- Dairy farms will have to reduce stocking rates on their farms (nutrient limits)
- Farmers will not be able to carry out intensive dairy support activities on their land
- Farmers will be required to protect areas of biodiversity on their land
- There may be limitations on change of use, particularly to more intensive farming activities
- OVERSEER is not precise enough to be used as the basis for important decision making. It does not address arable farming or mixed cropping and livestock farming
- Eco-N is not well proven
- The proposed Plan has created a great deal of uncertainty among farming families, especially where they are in the process of changing generations/succession planning. Given the lack of precision in the assessment process, and the lack of knowledge from many involved— including farmers, hydrologists, Ecan staff, scientists, farm advisors and others— it may take years to resolve the issues with any degree of certainty.
- Issues are arising that need further discussion. The Plan should not be rushed through.

Ends