



14 December 2012

The Commissioners,
 Proposed Canterbury Land and Water Regional Plan,
 Environment Canterbury,
 P.O. Box 345,
 CHRISTCHURCH 8140

EC - CHCH			
FILE REF: PLAN/LWRP/OREF			
DOCUMENT No.: 145709			
20 DEC 2012		ACTION	INFO
V Smith			
EC135137-100517			

684/S

Re Further Submissions on behalf of Talley's Group Limited and South Pacific Meats Limited

We attach herewith a submission in support of various submissions made by Graham Lowe Tannery Limited, Synlait Milk Limited, Silver Fern Farms Limited, Anzco Foods Limited, CMP Canterbury Limited & Five Star Beef Limited and Hydrotrader Limited. A copy has been served on the submitters under cover letter of even date.

In supporting the submissions the companies primarily rely on the reasons put forward by the original submitters.

As additional background it is noted that Talley's Group Limited (Talleys) owns and operates a food processing plant at Fairfield Road, Fairton. In addition to the Complex, the balance land comprising some 224 hectares is used for the growing of crops and disposal of processing waste water and stormwater through irrigation.

The Complex produces frozen vegetables and potato fries, and the suite of vegetables currently processed include broad beans, peas, corn, carrots, potatoes, pumpkin.

The Complex operates all year and employs between 150 and 250 local staff depending on season. The Complex also operates as an essential market for vegetables from many local farmers in the region. The Complex is a major contributor to the local economy with up to 10 million dollars in wages and 25 million dollars in farmer payments alone.

South Pacific Meats Limited ("SPM") operates a newly expanded meat processing plant located on Two Chain Road, approximately 34 km from Christchurch, 11.5km from Rolleston, and 6.5km from Dunsandel. The plant will employ approximately 400 local staff depending on season and be a major contributor to the local economy bringing in approximately 150 million dollars a year in wages, operating expenditure, livestock purchases in the region and transport expenditure.

The flow on or multiplier effect of the economic contribution from the plants is of course many times greater and given recent regional difficulties has a significant beneficial effect on the region. At the same time, such plants, by virtue of the large capital investment tied up with them, provide long term confidence in employment and market opportunities for workers and farmers within the districts in which they are sited and thus provide long term financial security to such districts.

Given the large investment in plants such as these, their great significance to the local economy and thus to the well-being of those in the communities in which they are situated and the widespread negative effects local communities suffer when large employers close down operations, Talleys and SPM consider it important that the Regional Plan explicitly recognises the importance of primary food industry processors and the potential negative impact on such industries, their farmer suppliers their employees and the local communities in which they are sited, in the event that water supply was constrained or unrealistic constraints are imposed as a result of a failure to properly consider benefits achieved against the type and level of adverse effect that is involved.

Talleys and SPM also support the view that cross sensitivity issues should be considered, when considering consents for new activities that might negatively impact on the viability of such plants.

Talleys and SPM also strongly endorse the submission that a requirement to surrender any part of a water consent on transfer is wrong in principle, likely ultra vires and contrary to achieving an outcome that seeks to see the wise/best use of the available water resource.

Primary industries are large users of water and the ability to expand plant operations for the benefit of the region requires that increases in take are obtainable. Further, additional water for irrigation of wastewater to land assists in minimisation or elimination of leaching of nutrients and should be encouraged.

To impose a compulsory surrender provision on transfer is likely to prevent the ability to acquire additional water for such purposes and at the least will be a significant and unwarranted hindrance which will result in unnecessary loss of productive capacity of farmland.

**Yours faithfully,
Solutions Law Office**



Graeme Malone

Copy to:

Graham Lowe Tannery Limited,
P.O. Box 444,
HASTINGS

Synlait Milk Limited,
1028 Heselton Road,
RD 13,
RAKAIA 7783

Silver Fern Farms Limited,
P.O. Box 283,
CHRISTCHURCH 8140

Hydrotrader Limited,
P.O. Box 3132,
CHRISTCHURCH 8140

Anzco Foods Limited,
CMP Canterbury Limited &
Five Star Beef Limited
C/- URS Limited
P.O. Box 4479,
CHRISTCHURCH 8140



Further Submission on Proposed Canterbury Land and Water Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No: PLAN/LWRP/DRFT/6SU/5

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 further submission by 5.00pm Thursday 20 December 2012 to:

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

Full Name: <u>TALLEY'S GROUP LIMITED</u>	Phone (Hm): <u>03 544 5134</u>
Organisation*: <u>SOUTH PACIFIC MEATS LIMITED</u>	Phone (Wk): <u>03 544 5134</u>
* the organisation that this further submission is made on behalf of	
Postal Address: <u>P. O Box 5, MOTUEKA</u>	Phone (Cell): <u>021 322 513</u>
	Postcode: <u>7143</u>
Email: <u>gmalone@solutionslawoffice.co.nz</u>	Fax: <u>03 544 5139</u>
Contact name and postal address for service of person making further submission (if different from above): <u>Circeme Malone, Solutions Law Office, P.O Box 3462, Richmond 7050</u>	

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 further submission; or

I do wish to be heard in support of my further submission; and if so,

I would be prepared to consider presenting your further submission in a joint case with others making a similar submission at any hearing

Service of your further submission:
Please note: any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: [Handwritten Signature] Date: 18-12-12

(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) Support or oppose
Name & postal address of original submission	Submission point reference number i.e. 4.23	Provide reason for support or opposition	Note support or oppose
Graham Lowe Tamery Limited, PO Box 444, HASTINGS	82.33	THE REASONS FOR SUPPORT OF ALL SUBMISSIONS REFERRED TO HEREIN ARE FOR THE REASONS OUTLINED BY THE ORIGINAL SUBMITTERS AND AS SET OUT IN THE ATTACHED LETTER	SUPPORT
	82.41		SUPPORT
Synlait Milk Ltd,	187.31		SUPPORT
1028 Heslerton Rd,	187.32		SUPPORT
RD 13, RAKAIA 7783	187.34		SUPPORT
	187.37	SUPPORT	
	187.49	SUPPORT	
SILVER FERN FARMS	257.33	SUPPORT	
LTD, PO Box 283,	257.43	SUPPORT	
Christchurch 8140	257.66	SUPPORT	
ANZCO FOODS LTD,	317-31	SUPPORT	
CMP CANTERBURY LTD &	317-32	SUPPORT	
FIVE STAR BEEF LTD	317-35	SUPPORT	
CI-URS LIMITED	3.17-49	SUPPORT	
PO BOX 4479	3.17-51	SUPPORT	
CHRISTCHURCH 8140	3.17-56 *	in so far as Rule 107(5) should be deleted	SUPPORT

Add further pages as required – please initial any additional pages.

(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) Support or oppose
Name & postal address of original submission	Submission point reference number i.e. 4.23	Provide reason for support or opposition	Note support or oppose
HYDROTRADER LTD, P O Box 3132, CHRISTCHURCH 8140	223.2 223.4 * 223.5	in part - being deletion of 5.107(5) in part being deletion of reference to Surrender and change to discretionary	SUPPORT SUPPORT SUPPORT

Add further pages as required – please initial any additional pages.