Submission on Proposed Variation
1 to the Proposed
Canterbury Land and Water
Regional Plan

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 21 March 2014 to:
Freepost 1201 Variation 1 to pWRP
Environment Canterbury
PO Box 345
Christchurch 8140

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Full Name: Christine Patricia Davidson
Organisation: Eglinton Dairy Farmers Group
Postal Address: 4133 Lower Lake Road, Lakeside Rd 3 Leeston
Email: overthekill@scorch.co.nz

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Postcode: 7683
Fax: 

Trade Competition

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With the compliments of

Received by Environment Canterbury 21-3-2014 16:27

Nathan Beights

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Everything is connected
Promoting quality of life through balanced resource management.
Submission on Proposed Variation
1 to the Proposed
Canterbury Land and Water
Regional Plan

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 21 March 2014 to:
Freepost 1201 Variation 1 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Christine Patricia Donald
Organisation: Lake Gleenore Dairy Farmers Group
Postal Address: C/133 Lower Lake Road Lakeside RD3 Leeston
Email: overthehill @ scorch.co.nz

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:
✓ 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
☐ I am not directly affected by an effect of the subject matter of the submission

Signature: __________________________ Date: 20/March/2014

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for conveys, 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,
☐ I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing.
(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.)

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<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
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(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.)

Add further pages as required – please initial any additional pages.
SUBMISSION ON PROPOSED VARIATION 1 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN

We are a group of dairy farmers who farm within the Cultural Landscape/Value Management Area.

We have all farmed in this catchment for generations. We do not disagree with continued improvement and good farm management practice. However this plan introduces a lack of uncertainty around how we are going to farm in the future. This affects both us and the generations to come.

Lack of clarity around nitrogen loss and consent requirements creates a lot of burden, stress and financial uncertainty.

We wish to make the following submissions:

Schedule 24 Section 5

We are happy to accept all conditions. Most are currently part of our Best Practise anyway and reflect Fonterra’s Code of Practise.

Section 4 – 8 Policy 11.4.23

This policy means existing takes are based on annual volumes used at the time of consent renewal.

This does not take into account the variation in the seasons, severe weather events, undeveloped land or changes in land use. There may be economic constraints on development or usage.

We would like it to be unchanged. That way what we don’t use stays in the system.

Rule 11.5.37
We want removal of the reference to 50% in the transfer of water permits. Water can then be redirected to its most efficient use. Surrender of water should be on a case by case basis included in the policy rather than a rule.

**Rule 11.5.21**

We want to delete that all farms in the area would need a resource consent for their drains regardless of whether you are complying with any other consent.

These drains contain water from catchment areas upstream which don’t belong to the consent holder and are outside of our control e.g. human effluent in Tramway Reserve drain. There are also an excessively large number of drains that would be covered by this rule. We suggest that drain management should be part of our Farm Environment Plan.

**Rule 11.5.28**

We want to delete the storm water resource consent that requires any discharge not into a reticulated system to have a resource consent.

This would mean anything off our house roof, dairy shed roof, calf sheds etc would require a consent. This is onerous and unnecessary and goes against industry good management practise e.g. that storm water is diverted away from effluent systems.

**Rule 11.5.18**

Requires stock exclusion from drains.

We support this in principle, but the definition of a drain needs to be clarified e.g. if there is no water in it it shouldn’t need to be fenced permanently. We suggest that a drain is defined
consistently with the Sustainable Dairying Water Accord i.e. permanently flowing and wider than 1 meter.

Table 11(i)

Water quality.

We would question the nitrogen loading limit of 95% coming from farming activities and only 5% from urban, industrial and trade discharges to land.

Policy 11.4.14

Requires reduction in N loss of 30% beyond good practice for dairy farm systems.

We don’t know what the good management practice number is, and that will dictate whether a 30% reduction is possible or practical.

Currently we consider our farms are at good practise e.g. utilising efficient irrigation systems and effluent systems which meet or exceed industry standards.

For us to go beyond this we might be looking at reducing stock numbers or feed pads or housing barns. This would have a significant impact on our farming viability.

We also question the 30% figure for dairying and how this has been arrived at when other farming practices have a requirement for as little as 5%. These reductions are based on EBIT which we don’t feel is a fair representation e.g. debt servicing on a per hectare basis is higher for dairy farmers than other land users. This is likely to overstate dairy farm liquidity.

Because of the scale of dairy farms often being smaller than other pastoral farming systems it means our drawings per hectare are higher (e.g. a management wage) and these costs are excluded from EBIT. We suggest this Rule should be removed and reviewed once the Good Management Practice numbers are determined.
Huntersview Farm Limited
Per: [Signature]

Arundel Farm Holdings Limited
Per: [Signature]

Neuways Farm Limited
Per: [Signature]

N.J. Skilling Farms Limited
Per: [Signature]

G.F. & D.A. Donald Limited
Per: [Signature]

Parkin Farming Co
Per: [Signature]

Mabui lands ltd
Per: [Signature]

CA-LE Eggleston
Per: [Signature]

Brent Fisher
Per: [Signature]