



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

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S. Drummond
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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:

Freeport 1201 Variation 1 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Christine Patricia Donald Phone (Hm): 3243400
 Organisation: Lake Ellesmere Dairy Farmers Group Phone (Wk): 3243400
 * the organisation that this submission is made on behalf of
 Postal Address: 4-133 Lower Lake Road Phone (Cell): 0273123807
Lakeside RD3 Leeston Postcode: 7683
 Email: overthehill@scorch.co.nz Fax: _____
 Contact name and postal address for service of person making submission (if different from above):
same as above.

Trade Competition

With the compliments of

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Nathan Dougherty



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Promoting quality of life through balanced resource management.



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

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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: [Signature] Date: 20/march/2014
(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,
 I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

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 practise. 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:

Schedule24 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 useage.

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.

Dated this 20 day of March

2014

Huntersview Farm Limited

Per:



Parkin Farming Co
L J Parkin

Arundel Farm Holdings Limited

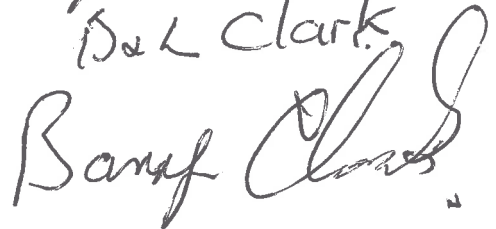
Per:



Matai lands ltd

~~Handwritten signature~~ Sven Berger.

D & L Clark



Neuways Farm Limited

Per:



CA-LE Eggleston



N.J. Skilling Farms Limited

Per:

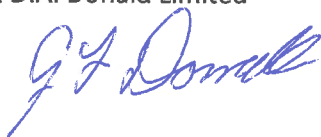


Simon Manson



G.F. & D.A. Donald Limited

Per:



Brent Fisher

