

Janel Hau

From: Catherine McCallum <catherine.mccallum@tp.co.nz>
Sent: Monday, 9 June 2014 4:41 p.m.
Subject: Further Submission on Variation 1 of the Land & Water Regional Plan
Attachments: 20140609164005695.pdf

Categories: Purple Category

Dear Sir/Madam

Please see the **attached** further submission regarding Variation 1 of the Land & Water Regional Plan for Erralyn Farm Ltd and Krysette Ltd.

Can you please confirm receipt of the submission. If you have any questions please do not hesitate to contact us.

Kind regards

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**FURTHER SUBMISSION ON VARIATION 1 TO THE PROPOSED CANTERBURY LAND and
WATER REGIONAL PLAN**

Clause 8 First Schedule, Resource Management Act 1991

TO: Environment Canterbury
Freepost 1201
Variation 1 to the proposed Canterbury Land and Water Regional Plan

By email: mailroom@ecan.govt.nz

Name of Submitter: Erralyn Farm Limited and Krysette Limited

1 This further submission is on:

Variation 1 to the Proposed Canterbury Land and Water Regional Plan (**Plan**)

2 The submitter supports in full the following submissions

- 2.1 Dairy NZ;
- 2.2 Fonterra Co-operative Group Limited;
- 2.3 Synlait Farms Limited; and
- 2.4 Canterbury Grasslands Limited.

3 The submitter supports the submissions for the following reasons

- 3.1 The Plan should acknowledge the very significant economic and social contribution generated by the use of land and water in the catchment. The need for people and communities to provide for their social and economic well-being must be a lens through which the Selwyn Waihora chapter of the pLWRP is both designed and implemented and this should be made explicit in the variation.
- 3.2 It is recognised that Te Waihora/Lake Ellesmere is a tribal taonga for Ngai Tahu and is highly valued by the wider community for a broad range of uses. At the same time it is considered important to also recognise that the catchment underpins a highly productive primary sector providing economic and social strength to the Canterbury region.
- 3.3 The Plan is currently formulated based on inaccuracies with the allocations, new minimum flow restrictions, legal weight given to consented activities and the escalation of these and lack of certainty around rule implementation. The Plan will therefore unduly restrict business growth.
- 3.4 The Plan will lead to inequitable treatment of similar farming operations as it now stands. There is also likely to be high costs in identifying baselines and monitoring non complying farmers.

3.5 Too many farmers are unable to understand the full implications of the Variation to their business. The potential financial implications need to be fully understood. The farming community is a vital contributor to the wellbeing of this catchment.

4 The submitter opposes in full the submission of North Canterbury Fish and Game Council

5 The submitter opposes the submission of North Canterbury Fish and Game Council for the following reasons

5.1 It seeks a more onerous planning framework, particularly with regard to nutrient management. The changes sought jeopardise the continued rural productivity of this sub regional area.

Dated this 9th day of June 2014



A C Limmer / C J McCallum
Counsel for the Submitter

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