

## Make Submission

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<b>Event Name</b>	Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan
<b>Submission by</b>	Mr Ben McLauchlan
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*State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.*

**My submission is that:** Oppose

*Please state your reasons for supporting/opposing/amendments sought*

**My reason(s) for supporting, opposing or requesting amendments to this specific provision are:**

**These reasons relate to the positioning, definition and translation of Groundwater Zone boundaries.**

It should be noted that in general I agree with the proposition of the Canterbury Land and Water Regional Plan. I am in an agricultural setting and also have my own desire to care for the qualities of both land and water.

**Reason 1 for opposing in part this specific provision:**

The Proposed Land & Water Regional Plan provides the definition of a farming enterprise as “an aggradation of parcels of land held in single or multiple ownership (whether or not held in common ownership) that constitutes a single operating unit for the purpose of nutrient management.”

The referenced map, map - 01 in section 5, of the Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan shows farms with boundaries crossing over 3 zone boundaries. It is not clear within Variation 2 or the accompanying Section 32 report as to the anticipated environmental outcome or expectations of these farming enterprises. **While it is acknowledged that they must lie somewhere, the specific positioning of the Groundwater Zone boundaries has implications for both farm**

**management and future water quality, and as they are currently shown is an issue that needs to be addressed.**

As an example: The farm Glengyle is situated at the convergence of the Ashburton river groundwater allocation zone; the Valeta groundwater allocation zone; and the Upper Hinds plains area. The farm Evandale under their management through a lease agreement is in a similar position. As a farming enterprise, the pragmatics and differing management requirements for the specified control of nutrients and the desired care for river courses bluntly changing mid-way through paddocks and non-differing terrain will be a problem.

**Reason 2 for opposing in part this specific provision:**

**The imprecision and simple coarseness of the maps used herein is insufficient.** It is a problem to any outcome of the Proposed Canterbury Land and Water Regional Plan.

As an example: On request of a more detailed map from Environment Canterbury, this map, map - 01 in section 5, of the Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan, was that which to I was referred. The map boundaries not only cross farm boundaries but streams; rivers; paddocks; buildings and houses etc. within farm boundaries. When overlaying this map onto a sufficiently detailed map provided by LINZ: not just these features, but a surprisingly large area of land is simply covered by the boundary lines in this map. The imprecision and coarseness of these maps is an issue that needs to be addressed.

*Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.*

**I seek the following decisions from Environment Canterbury:**

**Relating to Reason 1 above:**

This is relevant throughout the 'Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan' and the maps it uses. However using Map 01 as an example: **The rulings within the 'Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan' and Map 01 defining their position and limits need to relate precisely. The position of Groundwater Zone boundaries in Map 01 should be altered to allow for sensible management of farming enterprises at Groundwater zone boundaries . It should be considered that the position of Groundwater zone boundaries use, or atleast be more practical and relevant to the boundaries of farm enterprises.**

These should be relevant to its included definition of a farming enterprise as “an aggradation of parcels of land held in single or multiple ownership (whether or not held in common ownership) that constitutes a single operating unit for the purpose of nutrient management.”

**Relating to Reason 2 above:**

This is relevant throughout the 'Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan' and the maps it uses. However using Map 01 as an example: **Map 01 should define, and both relate and refer to: natural features, farm boundaries, and be of a scale translatable to the environment.**

Thank you for your time

Ben McLauchlan

**Tick relevant topics**