



Submission on Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan

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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 Monday 25 May 2015 to:
 Freepost 1201 Proposed Canterbury Land and Water Regional Plan
 Environment Canterbury
 P O Box 345
 Christchurch 8140

Full Name: Donald Partridge Butler Phone (Hm): (03) 6895889
 Organisation*: Butlers Fruit Farms Ltd. Phone (Wk): (03) 6895849
* the organisation that this submission is made on behalf of
 Postal Address: RD 8 Hook, Waimate Phone (Cell): _____
 Postcode: 7978
 Email: jackie@butlersberries.co.nz Fax: (03) 6895850
 Contact name and postal address for service of person making submission (if different from above):

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: _____

(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.

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my submission; and if so,
<input checked="" type="checkbox"/>	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 parts of the Proposed Plan that my submission relates to are:		(2) My submission is that:		(3) I seek the following decision from Environment Canterbury:
Section & Page #	Sub-section / Point	Support/ Oppose	Reason	
15: Pg5-7; Pg10-13; Pg 24, 32-33	Policies: 15.3 and 15.4.1 – 15.4.17. Rules 15.5.1-15.5.14. Tables 15 (c), (m) – (p)	Oppose	<p>I do not support the use of Overseer as it does not deal with Orchard properties such as mine. Overseer has no ability to determine a nitrogen load for Orchards so how can I comply with this plan?</p> <p>In addition support the NARG submission which is trying to sort out the problems with Overseer and catchment nutrient loads to bring in a fair, scientifically robust, flexible and financially viable method for managing nutrients.</p> <p>Water supply at our Butlers Berry Farm Café is badly polluted. Our well taking water from shallow groundwater (12 foot), is poor quality and is now unsuitable for use and we are being forced to go to deep groundwater for better water quality.</p> <p>We therefore support aims to improve water quality in streams and rivers, and consideration must be given to shallow groundwater quality improvement. It is essential all farming practices use good management practice and undertake Farm Environmental Plans</p>	<p>Include a method for determining nitrogen load for Orchards that is fair and robust or exclude Orchards from having to comply with these rules.</p> <p>Support the outcomes sought by NARG to bring in a fair, scientifically robust, flexible and financially viable nutrient management policies and rules.</p> <p>Ensure all farms use good practice and undertake Farm Environmental Plans, in order to not only address surface water quality but shallow groundwater quality as well.</p>

<p>15- Pg8; Pg 17 – 20; Pg 27; 31 - 32</p>	<p>Policies 15.4.21 – 27; Rules 15.5.26 – 15.5.36; Tables 15: (g), (j), (k) (l)</p>	<p>Oppose</p>	<p>We have three surface water consents within the Hook catchment, and have been reliant on these for over 40 years for our Orchard business. This water is critical to ensure our black currents in particular produce desired yields to maintain our business. Over-allocation in streams and rivers can be reduced, only if transferring to deep groundwater is made practical and financially viable. There must be provision made to get enough water to make it worth the financial investment and on-going running cost to take deep water. If we cannot get enough water it would not be worth going to deep groundwater. If this is not provided for by the plan or deep water cannot be obtained, minimum flow restrictions and reduction in allocation must ensure existing users have the ability to go to practical and financially viable alternatives. Users should not be forced into irrigation schemes if they are unviable for the property. Those within a water user group should be able to pro-rata reductions of takes rather than stepped reductions to ensure efficient and best use of water.</p>	<p>Ensure sufficient water available to transfer surface water to deep groundwater for existing users with an appropriate annual volume and rate to ensure it is financially viable. Pro-rata reductions in Table (g) for those within a water user group.</p>
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