

SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY
LAND AND WATER REGIONAL PLAN

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TRADE COMPETITION

I could not gain an advantage in trade competition through this submission.

I am directly affected by an effect of the subject matter of the submission.

SIGNATURE Sara Jane Harnett Kikstra

DATE 03 – September - 2019

I do wish to be heard in support of my submission:

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

The specific provisions of the proposed plan that my submission relates to are:

Rule 5.42CA permits commercial vegetable growing operations on properties 0.5 hectares or less.

I oppose this rule because:

This new rule is not consistent with other farming sectors. It prohibits the use of lifestyle blocks which may be outside your “**sub region**” because of a low nitrogen base line. Under PC 5 properties under 10 hectares were excluded. The cost of the FMP and any resource consent is not relative to the size of the property e.g. the property may be .6 hectares or it may be 300 hectares. The rule favours the bigger corporate style farms who may have the resources for more administration. I also question the legality of requiring another resource consent to farm if a property already has a resource consent to farm.

RULE 5.42CB requires resource consent as a restricted discretionary activity if an FEP has been prepared in accordance with Schedule 7 and submitted with the application, the area of land used for the operation is no greater than the baseline commercial vegetable growing area, and all land forming part of the operation is located within the same sub-region and Nutrient Allocation Zone.. Six matters of discretion are included which relate to GMPs, methods to avoid or mitigate adverse effects, FEP audit dates and methods, reporting, and methods to demonstrate nutrient discharge reductions and prevent exceedances of any applicable nutrient load limit.

I oppose this rule because:

This rule does not allow for flexibility or expansion. There is no pathway for new farmers. It does not allow for leasing or owning land outside your sub region particularly sub regions which may have a high number of lifestyle blocks with a low nitrogen baseline.

RULE 5.42CC requires resource consent as a discretionary activity where operations are greater than the baseline growing area or the land used by the operation is not located within the same sub - region and Nutrient Allocation Zone, provided an FEP has been prepared in accordance with Schedule 7 and submitted with the application and the nitrogen loss rate applicable to the proposed location.

I oppose this rule because:

This rule does not allow for expansion and makes it a prohibited activity to lease land outside your sub region which has a low nitrogen base line.

RULE 5.42CD requires resource consent as a non-complying activity where operations do not prepare an FEP in accordance with Schedule 7 and submit it with the associated resource consent application.

I oppose this rule because:

This rule is too punitive.

RULE 5.42CE prohibits new or expanded operations that exceed the nitrogen loss rate applicable to the new location.

I oppose this rule because:

This rule is also too punitive

In general terms I am opposed to these rules because they will not meet the expectations of **POLICY 4.36** in terms of water quality but will simply add layers and layers of bureaucracy and costs to the farmer. The delays in resource consent could mean delays in planting and ultimately no crop at all. The rules indicate that the rule makers have no comprehension about farming.

I am opposed to this Plan Change because of the adverse effects on:

- **Canterbury landscape because of the marginalization of farming**, for example changes to land use, such as urban sprawl and more industrialization in the rural zone. Farming provides green open space.
- The increase in the cost of vegetables
- The adverse effect on health because of the increase in cost of healthy food.
- The adverse effect on the economy because of a reduction in farm production.
- An increase in pests and diseases in plants because by its very nature only land that has an established nitrogen baseline is able to be used.
- An increase in stress and suicide rates for farmers because of added bureaucracy, delays and costs.
- An increase in unemployment and social issues through a reduction in farm jobs and businesses that rely on farming.
- The lack of science based facts and figures

- The adverse effect on the environment from other activities that may replace farming.
- The adverse effect of a punitive rather than a collaborative approach.
- Creating a bigger divide between urban and rural
- The adverse effect on water quality because it fails to take a collaborative approach through scientific research and on farm assistance and resorts to box ticking.