

**From:** [robins@ezykonekt.co.nz](mailto:robins@ezykonekt.co.nz)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan  
**Date:** Tuesday, 10 September 2019 5:55:03 PM

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To whom it may concern

Please see attached Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan.

Yours Sincerely  
Mark and Mandy Robins



## Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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Submitter ID:

File No:

**Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 5 of Schedule 1 of the Resource Management Act 1991**

**Return your signed submission by 5.00pm Friday 13 September 2019 to:**

Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
P O Box 345  
Christchurch 8140

**Full Name:** Philip Mark & Amanda Kaye Robins **Phone (Hm):** 036147440  
**Organisation\*:** PM & AK Robins Farming **Phone (Wk):** 036147440  
\* the organisation that this submission is made on behalf of  
**Postal Address:** 154 Ranclo Rd Totara Valley **Phone (Cell):** 0276147014  
12 RD Pleasant Point **Postcode:** 7982  
**Email:** robins @ ezykonec . co . nz **Fax:** \_\_\_\_\_  
**Contact name and postal address for service of person making submission (if different from above):**  
Mark Robins

### 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:** PM Rd **Date:** 9 Sept 2019

(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 my submission in a joint case with others making a similar submission at any hearing



To whom it may concern.

My name is Mark Robins. I am 62 years of age and have lived and farmed in the Opihi catchment all my life. My wife Mandy and I are sheep and beef farmers in Totara Valley, near Pleasant Point. We run a sustainable farming business. We use minimal chemicals and have done so for 40 years. We use little to no Nitrogen. Our fertiliser use is low in comparison to other forms of farming but is enough to maintain our production. We have a very high earthworm population which indicates healthy soil. Our farm has 120 hectares of irrigation via K-Line and we are Opuha Dam shareholders.

This submission is in support of Opuha Water Limited's opposition to the PC7 minimum flow regime (for 2030 in table 14(W)), and the faster draw down of the lake in dry years. Opuha Water Limited has formed a Release Advisory Group (OEFrag) which has effectively controlled water levels in the past. PC7 has wiped this group. The flow regime in PC7 will drain the dam and dry up the river, having the opposite effect of what is desired. The whole river system will be worse off. It appears to me that ECAN has a corporate memory and does not remember how before the dam was built, the river used to dry up during drought years.

In terms of the partial restriction regime set out in Table 14(V) we have two main concerns:

1. The PC7 approach, which is a 50% restriction for a level 1 regime and a 75% restriction for a level 2 regime, is a significant deviation from current practices and will have significant consequences for irrigators. It is too harsh and fails to recognise the benefits of the Opuha Dam, which irrigators own and fund.
2. The 24 hour volumetric restriction for irrigators will lead to gross inefficiencies of water released from the Opuha Dam.

In addition to this, PC7 has no regard for the financial impact of this regime, the personal cost this would have, or the investment by the farmers to build the dam and their on-farm irrigation systems. When farming regulations in Europe and the UK were imposed, making farming more restrictive, the farmers were supported financially. New Zealand farmers will never be supported financially in this way by the government or Environment Canterbury.

Decisions we seek from Environment Canterbury for PC7:

1. Delete Table 14(W) in its entirety.
2. Delete the partial restrictions in Table 14(V) and replace with Table 14(Viii) submitted by the Adaptive Management Working Group (AMWG).
3. Adopt a fortnightly volumetric restriction, based on a restriction regime for the Mainstem.

It is evident to us the adverse effects that PC7 in its current form will have on irrigators, the river and South Canterbury's economy. Therefore, we wish to record our support for the Opuha Water Limited's submission to oppose the PC7 minimum flow regime

Yours sincerely

Mark and Mandy Robins