

**From:** [Abby France](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 Submission  
**Date:** Friday, 13 September 2019 5:22:54 PM

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Hi there

Please find my attached submission for plan change 7.

Many thanks

Abby



**Abby France**

Rural Manager

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

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 by:

- Email: [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz) (subject heading: Plan Change 7 to the LWRP Submission)
- Post: Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
PO Box 345  
Christchurch 8140

**Organisation:** Great Southern Deer Farms Limited

**Phone hm and wk:** 0275508725

**Email:** office.antler@gmail.com

**Contact name and postal address for service of person making submission** (if different from above):

Abby France, 420 Sercombe Road, RD21, Geraldine, 7991

### 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

Signature:  Date: 13 September 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 this submission in a joint case with others making a similar submission at any hearing

**Notes.** We found the PC7 document more suited to planners and policy makers rather than those that are directly affected by them. Some of the farmers in our community chose to not to be involved in this process as they found reading and understanding the implications of and proposed changes from the plan and making a submission too difficult and confusing.

<p><b>(1) The specific provisions of the Proposed Plan that my submission relates to are:</b></p>	<p><b>Livestock exclusion from waterbodies (OTOP Zone), Section 14, pages 134 – 135, provision 14.4.15</b></p>
<p><b>(2) My submission is that:</b> <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i></p>	<p><b>Oppose or Amend</b></p> <p>Oppose the blanket use of “stock exclusion” for “the region-wide provisions on livestock exclusion also apply to” “intermittently flowing springs (Waipuna) and artificial watercourses with surface water in them...”</p> <p>Less intensively farmed areas, such as hill/tussock country that can include intermittently flowing springs can have stock access without degradation to the water course or water within them. The stocking rates in these areas are low and the waterways are only accessed by stock as a periodic drinking water source.</p> <p>Runoff/seepage may occur from these areas may result from flooding/significant rainfall events while these springs/ waterways are running at higher flows (usually for short periods of days) which is a naturally occurring runoff as can be seen widely in national parks and areas that are not farmed. This is not a result of stock having access to these types of waterway.</p> <p>These springs and water courses would be extremely difficult to identify and fence off due to access, the changing nature of their flows and the economic viability of these large area/low stocking rate properties.</p> <p>We would like springs in expansive, low intensity farming areas (those that have stocking rates of less than 5Su/Ha) excluded from the above provision.</p>
<p><b>(3) I seek the following decisions from Environment Canterbury:</b> <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand)</i></p>	<p>Clarification required around what this would entail as fencing off remote, steep hill country, lower magnitude springs and waterways would incur, in some cases, significant loss of grazing land, and/or prohibitive costs and/or would not achieve good water quality results (when compared to focusing on intensively farmed gullies and waterways on farm that do carry water).</p> <p>Exclude “stock exclusion” for low stocking rate, steep inclined tussock./hill country land from the above provision.</p> <p>Recognition that livestock exclusion from ephemeral springs and artificial waterways/drains on non-intensive farms may not always be needed to achieve good water quality. Alternative management practices exist and are used by deer farmers.</p>

**Add further pages as required.**