Submission on Proposed Canterbury Land and Water Regional Plan

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 Friday 5 October 2012 to:
Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Mark Hunter. LEMON
Organisation*: Property Brokers
* the organisation that this submission is made on behalf of
Postal Address: P. O. Box 119
Ashburton
Email: markleamon@propertybrokers.co.nz
Contact name and postal address for service of person making submission (if different from above):

Trade Competition

Pursuant to Clause 6 of 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 that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
☐ I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature: [Signature]
Date: 2nd October 2012

(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,
☑️ If others make a similar submission, I will consider presenting a joint case with them at the hearing.
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section 2</strong></td>
<td></td>
<td>Oppose</td>
<td></td>
</tr>
<tr>
<td>Page 5</td>
<td></td>
<td>The setting of the base nutrient loss levels on the 2 year average badly distorts values within the property market. The proposed 10% N loss increases allowable is limiting to future production potential and distorts values risks around misrepresentation are also heightened. Also, 10% N loss increases which can happen as a season to season variance is too restrictive.</td>
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<td>A change to a soil type and rainfall data based assessment for nutrient loss levels. This provides a far more credible base and takes out current land use distortions where high nutrient loss properties are offset against existing lower loss properties to the less intensive properties detriment.</td>
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<td>Note. All land use change applications must be completed within 20 working days.</td>
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<tr>
<td><strong>Section 13</strong></td>
<td>Policy</td>
<td>Oppose</td>
<td></td>
</tr>
<tr>
<td>Page 2, 13:4.1</td>
<td></td>
<td>The take of water for stockwater should cease as they are the major contributor to surface water quality issues.</td>
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<td>Many farms are now using groundwater for stockwater. Many farms run through farms not using them but required to fund them for those who still use them.</td>
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<td></td>
<td>Sense community surface water stock water supplies from the Ashburton River catchment. This will change the RED on the Planning Maps from non-complying to discretionary.</td>
<td></td>
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</tbody>
</table>

Add further pages as required – please initial any additional pages.
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<tr>
<td>Section 5 Page 5-13</td>
<td>5-49</td>
<td>Oppose</td>
<td>With context of Schedule 8 yet to be defined, to impose Condition 2 in Rule 5.46 making some land use activity non-complying are set. While the average annual loss of nitrogen have yet to be set is pre-emptive.</td>
</tr>
<tr>
<td>Section 5 Page 5-13</td>
<td>5-46 (in part)</td>
<td>Oppose</td>
<td>The cost and relevance of a required Farm Environment Plan must be carefully managed. A Farm Environment Plan audit should be controllable and not another EC revenue collection exercise as constant monitoring has become.</td>
</tr>
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</table>