



# 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

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as 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: 2<sup>nd</sup> 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.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Section 2 Page 5	Changed to rules 5-42/195	Oppose	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	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 <del>the</del> the less intensive properties detriment  Note All land use change applications must be completed within 20 working days.
Section 13 Page 2.	Policy 13.4.1	Oppose	The take of water for stockwater should cease as they are the major contributor to surface water quality issues.	Many farms are now using groundwater for stockwater. Many races run through farms not using them but required to fund them for those who still use them Cease 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.

Add further pages as required – please initial any additional pages.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Section 5 Page 5-13	Section 5-48	Oppose	With content of Schedule 8 yet to be defined, to impose Condition 2 in rule 5.46 making some land use activity non-complying while the average annual loss of nitrogen have yet to be set is pre-emptive.	I seek no actions relating to Condition 2 be imposed before Schedule 8 levels are set.
Section 5 Page 5-13	Section 5-46	Oppose (in part)	The cost and relevance of a required Farm Environment Plan must be carefully managed.	A Farm Environment Plan audit should be cost-effective and not another ECan revenue collection exercise as consent monitoring has become.

Add further pages as required – please initial any additional pages.