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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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: A. Swallow
Date: 4/10/12

(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>
<th>Decisions to be made 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.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-11-12 5:39-5:41</td>
<td>Oppose (in part)</td>
<td>Limiting permitted activity scales to activities up to 11/3/12 is a barrier to land use change, particularly relatively minor ones which may not justify the hassle of a consent application. Even where a farmer decides to seek consent, this requirement will slow the industry's ability to respond to economic drivers, to the detriment of the region's economy. I am also concerned at the administrative burden this is going to impose on CRC, and the consequent cost to ratepayers.</td>
<td>If we must have these controls, introduce some degrees of scale, or thresholds, above which changes in land use become discretionary. For example, by area, or stock units, or by time. Or require the conditions 1, 3 or 4: 0.00 per point 5.46 to be met, as that's where we're going to have to be come 2017. Anyway.</td>
<td></td>
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<tr>
<td>5-12 5:42</td>
<td>Oppose (in part)</td>
<td>Too many conditions for too be practical on smaller farms. As with many other points in the plan, this is creating a consultants' charter, and overheads.</td>
<td>Threshold area or stock numbers cut which these conditions are required.</td>
<td></td>
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<td>5:17 5.46</td>
<td>Support (in part)</td>
<td>Assuming CRC has set sound scientific reasoning behind these nutrient loss limits, this seems a pragmatic way forward, however there seems to be an excessive focus on nitrogen, without adequate reference to other potential pollutants, such as phosphorus and/or sediment. On this point, and throughout the farming sections, I am concerned at the reliance on Overseer, both because of the model's widely recognized limitations, and the fact it is beyond many farmers' capability to run it.</td>
<td>5.42 cm/day... the farming industry, indeed New Zealand, can ill-afford.</td>
<td></td>
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</tbody>
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