

Gay Gibson

From: Sarah Drummond
Sent: Wednesday, 26 March 2014 11:10 a.m.
To: Gay Gibson
Subject: TRIM: FW: Submission to Land & Water Plan
Attachments: Submission By KD Smith on Variation 1 to Land & Water Plan.pdf

HP TRIM Record Number: C14C/45669

Hi Gay

This one can be entered in as a submission

Thanks

From: Dougal Smith [<mailto:Dougal@propertyadvisory.co.nz>]
Sent: Wednesday, 26 March 2014 11:05 a.m.
To: Jason McDonald
Subject: FW: Submission to Land & Water Plan

From: Dougal Smith
Sent: Friday, 21 March 2014 3:43 p.m.
To: 'mailroom@ecan.govt.nz'
Subject: Submission to Land & Water Plan

Afternoon

Please find attached my submission on the Proposed Variation 1 to the Proposed Canterbury Land & Water Regional Plan.

If you have any questions please don't hesitate to give me a call.

Regards

Dougal



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Submission on Proposed Variation 1 to the Proposed 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 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 21 March 2014 to:

Freepost 1201 Variation 1 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Kenneth Dougal Smith Phone (Hm): _____
Organisation*: _____ Phone (Wk): 03 342 3020
* the organisation that this submission is made on behalf of
Postal Address: 352 Helebon Rd Phone (Cell): _____
RD 1, DARTFORD 7572 Postcode: _____
Email: dougal@propertyadvisory.co.nz Fax: _____
Contact name and postal address for service of person making submission (if different from above): _____

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: _____ Date: 20 MARCH 2014

(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 your submission in a joint case with others making a similar submission at any 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	
11.5.37	3d,c	OPPOSE	Not equitable. Cannot afford CPA but want to be able to future proof farming operations and have the ability to obtain ground water in the future.	Remove clause C and D
11.1			Good Management Practice.	
11.4.13			This is not clarified in terms of nitrogen loss. Tables detailing losses per soil type and land use activity must be developed.	
11.4.14			As a farmer we cannot support this plan if the discharges as per 11.4.13 & 11.4.14 are unknown.	
			* The proposed nutrient allocation appears to reward historic polluters. Dry land 10 v dairy 20-50+	
			* Existing polluting farmers under an equitable system must not be able to have a baseline which is higher than the "average efficient" farmer today. Like with dryland farmers with low historic losses should	

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

- * not be restricted to extensive land uses.
- * The allocation and restriction on nitrogen will effect property values. Properties with high nutrients ~~with~~ baselines will have higher values compared to those with low baselines.
- * In effect low nutrient loss land use activities are transferring value to intensive nitrogen users.
This is not equitable!!
- * Nutrients must be allocated evenly over all land users and existing operators must be brought back to "average efficient"
- * All land owners then have the ability to trade in nutrients and reflect activities undertaken on their land.
The value of all land is equitably maintained.