

Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

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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 11 March 2016 to:

Freepost 1201 Plan Change 5 to LWRP
Environment Canterbury
P O Box 345
Christchurch 8140

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* the organisation that this submission is made on behalf of
 Postal Address: 828 RAY PADDOCK RD. Phone (Cell): _____
RD 2 AMBERLEY Postcode: _____
 Email: CLAREMONTESSTATE@EMAIL.COY. 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: [Signature] Date: 7/03/2016

(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

LAND & WATER REGIONAL PLAN

Submission on Ecan Plan Change 5 – Waipara River catchments

I own land with approximately 4Kms of river frontage along the Waipara river and my whole property has been deemed "Red Zoned" due to the high nutrient concentration in the Waipara river.

- 1) I should like to observe that there is no dairy farming along the upper Waipara and that the nutrient concentration within the Waipara is undoubtedly a natural phenomenon as the river runs through limestone rich rocks and soil types and furthermore is impacted by a natural limestone landslip upstream from the Waipara Gorge which includes natural springs that feed water into the Waipara river. *Accordingly, why should dry stock farmers have their livelihood jeopardised when there is no evidence that this farming operations have a negative impact on water quality. The proposed regime is tantamount to a restriction on trade. We own our farmland freehold and as freeholders we should have the right and flexibility to manage and expand our businesses as best we can. What other industry is prevented from improving and growing their business.*
- 2) *I am opposed to the inclusion of dry stock farms within the regulatory process. It is my understanding that ECAN have already accepted that dryland farming has an insignificant effect on water quality. Accordingly, why should dry stock farms be included within the regulatory process? – unless there is unequivocal scientific evidence to link the water quality issues with the specific farming operations. Permitted land use should not have extra unnecessary obligations and costs.*
- 3) *I am opposed unnecessary and onerous obligations and the high cost compliance model being rolled out by ECan. I suggest that dry stock farmers larger than 10ha who are not irrigating and who fertilize at less than a reasonable prescribed average level of Nitrates per hectare should be exempted.*
- 4) *I seek the removal of the inaccurately mapped Phosphorus zones.*
- 5) *I query the lack of robust science and "the one size fits all approach". This unfairly places the burden once again on many landowners. Not all land within the Waipara river catchment can justifiably be Red Zoned. Nutrient run off is not just caused by fertilizer application. Land formation and soil types have an impact as does the variable rainfall on non-irrigated land. These factors should be taken into account - as should land use distance from the river. In the specific case of my property there is a significant limestone ridge that runs through my land parallel to the Waipara river and forms a natural barrier. Most of the cultivatable land slopes away from the river. Accordingly it would seem improbable that any fertilizer application or cultivation for green feed would have any nutrient leaching impact into this section of the Waipara.*
- 6) *I am opposed to a maximum permitted cultivation for Green Feed as is proposed. The area of permitted green feed cultivation should be commensurate with the overall land area farmed. Alternatively there should be a maximum permitted fertilizer application per hectare (as I believe is the model used in the Selwin district). This would remove many dry stock farming operations from the regulatory process.*
- 7) *I support the removal of OVERSEER requirements. Overseer is still fraught with inaccuracies & the inventors have said it was never intended as a regulatory tool.*



- 8) *I support the need for landowners to be responsible owners of their land & their impacts on freshwater. However this should be non-regulatory.*
- 9) I support a Catchment Board type model similar to what operates in other regions [& used to work well in Canterbury]. This model has voluntary farm plans used to support on the ground actions not as a compliance tool & works with landowners in a system of trust. No regulatory use of OVERSEER & no auditing. This would seem to be a very low cost model for both Councils & landowners.

I WISH TO BE HEARD During hearings on submissions.

A handwritten signature in blue ink, appearing to be 'J. G. ...', located in the bottom right corner of the page.