

**From:** [Blake Foster](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission on Variation 5  
**Date:** Friday, 11 March 2016 10:52:44 a.m.  
**Attachments:** [Variation 5 Submission.pdf](#)

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Hi Please find enclosed a submission on Variation 5. Please acknowledge that you have received this email with the attachment thanks Blake Foster 027 268 1546

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

*Form 5: Submissions on a Publically Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991*

Full Name: Pukaki Tourism Holdings LP

Phone (Hm):

Phone (Wk):

Postal Address: PO Box 47, Twizel

Phone(Cell): 027 2681546

Postcode: 7999

Email: c.blake.foster@gmail.com

Contact name and postal address for service of person making submission (if different from above):

Blake Foster, PO Box 47, Twizel 7999

I wish to be heard in support of my submission.

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: \_\_\_\_\_

(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.

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**My Submission:**

- We submit on the following matters relating to the Plan Change 5. Please note that this submission encompasses any related objective, policy, or rule that alters as a result of our submission or any other submissions made. We therefore wish to be included in all matters related to the entire plan, but not specifically identified in my submission. Any aspects of the plan or proposed changes to the plan that do not support or achieve the outcomes sought by us are opposed. The rules and tables have been focused on and the policies will need to also reflect the outcome sought.
- Our principle reasons for taking this position are set out in our narrative discussion, below, with specific outcomes detailed in the table.

About me and my farm:

- Blake Foster. I am the farm manager and one of the directors of Pukaki Tourism Management Ltd, the general partner of Pukaki Tourism Holdings LP, and I live on the property at 397 Mt Cook Highway, Twizel.
- Pukaki Downs, 397 Mt Cook Highway, Twizel.
- Under the operative Land and Water Regional Plan (LWRP), my farm is located in an Orange nutrient allocation zone, which I understand to mean that water quality outcomes are at risk of not being met.
- My farm is dryland.

My understanding of the community process and expected outcomes from Section 15B of Plan Change 5 (Waitaki Sub-Region):

- Provided my farm had implemented and was operating under the industry agreed Good Management Practice (GMP), then I would be able to continue to farm as I have been.
- Expectations around GMP would be defined within the plan, and would include a range of practices and outcomes, not just focused on nitrogen.
- This would **not** require a resource consent.

**Reasons for my Submission:**

- The Plan is very difficult to understand. My expectation as a farmer of the plan; is that I should be able to pick it up and determine on my own where my property fits in.
- Most farmers under this plan, including me, would require a consent to farm and this is another layer of consenting that I consider to be totally unnecessary.

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P. B. Foster  
March 11/2016

The specific provisions of the Proposed Plan that my submission relates to are:		My submission is that	I seek the following decisions from Environment Canterbury
Section and Page number	Sub Section/Point	Oppose/Support	
Section 15B Waitaki Sub Region – Pages 4-1 to 4-35	Rule 15B.5.19, Policy 15B.4.13	Support in part Oppose in part	<p>I support the allowance of lawful exceedance in the Haldon Zone but oppose the restriction of adding a date in which lawful exceedance had to occur prior to.</p> <p>Rule 15B.5.19 allows for lawful exceedance in the Haldon and Mid Catchment zones but stipulates that the lawful exceedance must have occurred prior to 13 February 2016 – the notification date of Plan Change 5.</p> <p>Our concerns are very specific to our property, Pukaki Downs. Pukaki Downs has been infested with wilding pines for a number of years, the current owners are proactively working to reduce this infestation.</p> <p>Wilding conifer pines are a weed pest that now occupy approximately 1.7 million hectares, with the worst affected areas in Canterbury, Otago and Southland. The New Zealand Wilding Conifer Management Strategy 2015-2030 was released in December 2014 that looks at strategy to support effective collaboration between land occupiers, researchers, regulators and communities to address the critical overarching issues facing wilding conifer management.</p> <p>Until recently the management of wilding pines was to aerial spray large areas – which then requires the manual removal of the standing pines but does not control the seed bed that has established over a number of years in the soil, which allows for continual infestation and then a continual spray program which is not cost effective.</p> <p>Aerial spraying of large areas of land with no ability to generate additional income from the property due to planning restrictions is not sustainable in the long term.</p> <p>Recent information has indicated that the one of the most appropriate ways to manage the pines is by discing, cultivating and fodder cropping the area, and additionally allowing stock to graze the small wilding seedlings. At the same time cultivating and cropping the area increases the economic viability of the property by generating an income from this infested area.</p>
			<p>To allow for lawful exceedance of the Nitrogen baseline to occur after the 13 February 2016 in special circumstances for example for the control of invasive pest species such as wilding pines, throughout the Waitaki sub regional zone.</p> <p>To allow for consents to be applied for to further exceed the baseline and lawful exceedance in special circumstances e.g wilding pine control</p>

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Accepted 2016  
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			<p>Allowing lawful exceedance in the Haldon zone would ensure that at Pukaki Downs the cultivation and cropping of the affected areas could be undertaken but limiting this exceedance to having to occur prior to 13 February 2016 does not allow the active management of the wilding pines by cultivating and fodder cropping. The management strategy was released in December 2014 and along with the very dry last 18 months has not allowed time for Pukaki Downs to implement a control plan for the wilding pines prior to 13 February 2016.</p> <p>Allowing for lawful exceedance to occur after 13 February 2016 and also considering the Nitrogen headroom available to Pukaki Downs would allow for an economically feasible control program to be implemented.</p> <p>If lawful exceedance is not allowed to occur after 13 February 2016 in special circumstances then a control program of a large scale is not economically viable on Pukaki Downs, thus effectively allowing for the continual spread of this invasive pest plant.</p> <p>Support the availability of nitrogen headroom in the Haldon zone catchment, and the allowance for this headroom to be spread evenly over the applicable 172,000 hectares in the Haldon Zone.</p>
	Haldon and Mid Catchment Zones. Policy 15B.4.20, Schedule 27	Support	

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