

From: [John Murray](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Plan Change 5 to Canterbury Land & Water Regional Plan
Date: Friday, 11 March 2016 1:21:27 p.m.
Attachments: [Ecan plan C 5 toL&W SUB.docx](#)

Environment Canterbury

Attached is a Submission on Plan Change 5 to Canterbury Land & Water Regional Plan and a copy of first page of a submission form.

Regards

John Murray
The Wolds Station
Lake Tekapo



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

FOR OFFICE USE ONLY

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 11 March 2016 to:

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

Full Name: JOHN BRUCE MURRAY

Phone (Hm): 03-6806608

Organisation*: The Worlds Station Limited

Phone (Wk): _____

* the organisation that this submission is made on behalf of

Postal Address: The Worlds Station

Phone (Cell): 027 2941443

P.O. Box 154, Lake Tekapo

Postcode: 7945

Email: theworlds@farmerside.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: [Signature]

Date: 11 March 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

SUBMISSION

To **Environment Canterbury**

From **The Wolds Station Limited**

On **Plan Change 5 to the Canterbury Land & Water Regional Plan**

Date **11 March 2016**

Contact John Murray

The Wolds Station

PO BOX 154

Lake Tekapo 7945

Phone: (03) 6806608

Email: thewolds@farmside.co.nz

I wish to be heard in support of my submission

General

The Wolds supports a collaborative approach to water and nutrient management with representation from areas such as the Mackenzie Country which has issues unique to the area. This has resulted in a plan change which is largely acceptable.

In predicting nitrogen loss, Plan Change 5 and overseer do not allow for a possible decrease in nitrogen loss from, for example:

- The removal of nitrogen fixing weeds such as gorse, broom and alders from and adjacent to waterways.
- Fencing of water ways and buffer planting.
- Removal of septic tanks.
- Removal of geese and other wildfowl from waterways.

Relief Sought

Amend plan to allow individual farms to receive a credit for undertaking the above.

Border dyke irrigation is not mentioned in Good management practises. I assume and support that for GMP for border dyke irrigation is not required to meet spray irrigation efficiencies.

The Wolds supports the submission from Federated Farmers of New Zealand.

PART A

Method s28.3 Methodology for the application of nitrogen to pastoral systems under Good Management Practice page 6.21

The 2000 Kg of Nnonfert from Lucerne in the table seems too high. Allowance should also be made for the lower performance of Lucerne in dry areas such as the upper Waitaki where one cut and a bit of grazing is the norm compared to 5 plus cuts elsewhere.

Part B

Page 4.4

2nd paragraph

The water right and the order in council allowing the construction of the canals stated that irrigation was to be a use of the canals as well as power generation

Relief Sought

Change

” The braided rivers of the Mackenzie Basin were diverted into man-made canals,”

to “The braided rivers of the Mackenzie Basin were diverted into man-made canals for power generation and irrigation”,

Page 4.5

4th bullet point

The Mackenzie Agreement does not restrict intensification of farming activities to small blocks. It included provision for dryland development and recognised that OS&TD may help on extensive areas in tussock health

Relief Sought

Delete “on small blocks of land”

15B4.14 (a) Page 4.8

The Wolds asks what “evidence” is required to justify that the nitrogen baseline has been lawfully exceeded.

Much of the development such as spraying, fertiliser application, drilling, and fencing we have done ourselves and evidence on the timing and extent of development would be hard to prove. Or is it evidence that the development did not breach any rule in a Regional or District Council Plan.?

Relief Sought

Add a definition

15.B.4.22 (a) Page 4.11

Averaging losses from 1 January 2011 to 31 December 2015, penalises a farm such as ours that has undertaken a lot of development over that period. For example the calculated losses may be 7, 8,9,10 Kg N loss per year over that period which averages out at 8.5 but the property is probably doing 10 plus KgN/year. This is particularly unfair when other properties with irrigation consents are allowed to continue to develop when our development was done as a permitted activity without knowing how this plan would work.

Relief Sought

Change '2011' to '2016'

15B.4.23

Why is this requirement only for the Haldon and mid-catchment zones?

The Mackenzie District plan has already identified and protected some 80 plus SONS, the majority of which are for indigenous biodiversity. There are two on The Wolds

The RMA requires Regional and District Councils to identify and protect significant indigenous biodiversity, why are we being required to do the job for them if we need to obtain a consent?

Requiring no net loss of significant indigenous vegetation is unlikely to be achieved.

Relief Sought

Delete all of 15B.4.23

Thank you for the opportunity to present this submission.