

From: [Nicole & Shane](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 5 Submission - Shane and Nicole Phillips
Date: Friday, 11 March 2016 1:49:46 p.m.
Attachments: [PC5_Submission - Nicole and Shane Phillips.pdf](#)

Please find attached a submission on Plan Change 5.

Thanks

[Shane and Nicole Phillips](#)

Straggler Farming Ltd
73 Mount Florence Road
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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: Nicole and Shane Phillips

Phone (Hm): 03 4360 472

Postal Address: 73 Mt Florence Road, RD 1, Kurow

Phone(Cell): 0274140456

Email: Nicole.shane@farmside.co.nz

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

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:

- X 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
- 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 submission has focused on rules and tables but seek the polices also align with the outcomes being sought.



Signature:

Date: 11th 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

Our Submission:

- We wish to be heard in support of our 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.

Reasons for the Submission:

General

1. The Plan in its current form is complex and difficult to understand and there are concerns that parts are unworkable and not enforceable. Our expectation as farmers of the plan, is that we should be able to pick it up and determine on our own, where our farming operation fits in.

Issues specific to the Hakataramea River zone, hill zone and flat zone – Rules 15B.5.24 to 15B.5.33

2. We, as extensive flat/hill country sheep and beef farmers in the Hakataramea flat zone have concerns regarding any reduction in nutrient loss that may be required in the future if the water quality in the Hakataramea River deteriorates beyond the limits set in Table 15B (c) for the Hakataramea River at the Main Road.
3. We don't believe Plan Change 5 addresses the nutrient reduction issue in the policies or rules.
4. We operate an extensive merino sheep and beef farming system that has nutrient losses of around 4kg Nitrogen/ha/yr using Overseer v6.2.1. If we are required to reduce nutrient loss in the future then we have a very limited mechanism to do this on farm, other than to significantly reduce stock numbers, creating an uneconomic farming system. This is unjust and certainly not our recollection of the many community meetings held around the district.
5. We would be considered a permitted activity under PC 5 as we have no irrigation and grow no feed for winter grazing.

Relief Sought:

6. That there is further expansion to the rule/policy framework for the Hakataramea river, hill and flat zones that incorporates policies/rules to ensure high Nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.