From:	Kevin Tiffen
To:	Mailroom Mailbox
Cc:	Carolyn Johns
Subject:	FW: Submission from Waimate District Council
Date:	Friday, 11 March 2016 3:01:55 p.m.
Attachments:	20160311150009123.pdf

Hi Please find attached Council's submission. Regards Kevin Tiffen

-----Original Message-----From: ricoh205@waimatedc.govt.nz [mailto:ricoh205@waimatedc.govt.nz] Sent: Friday, 11 March 2016 3:00 p.m. To: Kevin Tiffen Subject: Message from "RNP002673960EAA"

This E-mail was sent from "RNP002673960EAA" (MP C3503).

Scan Date: 03.11.2016 15:00:08 (+1300) Queries to: ricoh205@waimatedc.govt.nz



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

Submitter ID:

FOR OFFICE USE ONLY

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

Phone (Wk): 03-689-0000
Phone (Cell):
Postcode: 7924
Fax:
]

## 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 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.

Date:

	I <u>do not</u> wish to be heard in support of my submission; or
	I do wish to be heard in support of my submission; and if so,
N N	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
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	it will be for the Council to understand your concerns.)
General		Supports in part	Council supports the general intention of the Plan Change 5,	
	······································		particularly affecting the Waitaki sub-region and acknowledges	
			the hard work it has taken the regional council and the water	
			zones committees to reach this stage.	
			However while Council endorses the introduction of new	
			region-wide nutrient management rules that require good	
			management practices, it is considered that the whole nutrient	· · · · · · · · · · · · · · · · · · ·
			management needs to be equitable to all farmers whether they	
			currently have intensive farming or not. It seems unfair that a	
			farm that has not yet converted to intensive farming will have	· · · · · · · · · · · · · · · · · · ·
			- more stringent nutrient loss limit imposed than an established	
			intensive farm. There should be a commitment for the over	
			nutrient loss farms to eventually reduce their nutrient baseline	· · · · · · · · · · · · · · · · · · ·
			over time to match the prescribed limit for the specific red lake,	
			orange, green, or light blue nutrient allocation zones. This	
			should also apply to irrigation schemes that manage the	
	-		nutrient losses for the irrigated area.	
			Council understands that the OVERSEER nutrient budget	
			model forms the basis of determining nutrient loss and while it	, a mining the second
			is probably the best (or only) system available, there is concern	
			that the OVERSEER model has changed and could change	
			again over time through modification or improvement. This	
			could potentially alter the nutrient baseline over time and	
			therefore, there is an element of uncertainty for the farmer who	
			wants to convert or the farmer who has made huge financial	
			commitments to convert to intensive farming.	
			Council does wish to be heard in support of its submission.	
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Add further pages as required – please initial any additional pages.