

From: [Ben Howden](#)
To: [Mailroom Mailbox](#)
Cc: ["Glen Smith"](#)
Subject: Rangitata Dairies Submission PC 5
Date: Friday, 11 March 2016 3:47:02 p.m.
Attachments: [Rangitata Dairies Submission PC 5.pdf](#)

Please find attached our submission on Plan Change 5. Glen Smith is to be the point of contact for further correspondence.

Glen Smith
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Thanks

Ben Howden

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Plan Change 5 to the CLWRP
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Submitter: Rangitata Dairies c/- Glen Smith (027 294 9124)

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

Trade competition

I could not gain an advantage in trade competition through this submission.

Background:

Rangitata Dairies LP has been farming land in the Mid and South Canterbury region for the past 15 years. Within the business, various members of the group are well involved and respected within the wider communities of these areas.

Hearings

The Orari Catchment Group wishes to be heard in support of this submission; and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

Submission:

My submission is recorded in the following table.

Page #	Policy # or rule #	Name of policy or rule	Support / oppose	Reason	Relief sought
Multiple	Multiple	Farm Portal and all definitions, policies and rules revolving around the use of the farm portal	Oppose	In general the concept and ongoing development of the farm portal modelling system is supported. <u>Oppose</u> ; Without access to the API modelling tool used in the calculation of the GMP N loss we have been unable to determine what changes have been made to the OVERSEER files and therefore cannot support the proxies. Given this we are unable to support any definitions, policies or rules that rely on “GMP N loss rates” as calculated using the farm portal. The farm portal should not become fully operative until the accuracy of this modelling has been assessed in depth and proven to be accurate beyond all doubt.	Clarity around “all” the proxies used in the modelling of the GMP loss rate through the farm portal.
3 – 2	Section 2 – How the Plan Works & Definitions	Definition of Good Management Practice Loss Rate	Oppose	The definition of “Good Management Practice Loss Rates” and the reference to the Farm Portal leads to a lack of flexibility.	An option for farms to choose between the use of the GMP loss rate as calculated by the farm portal or an OVERSEER (not farm portal) model prepared by a suitably qualified person with sufficient evidence to support the reason for the use of the OVERSEER modelled GMP loss rate.
3 - 3	Section 2 – How the Plan Works & Definitions	Definition of Winter Grazing	Oppose	The definition provided in the plan is too broad. The dates specified in the definition relate to time periods where cattle will be located on dairy farms (May, August and September). These cattle may be milking during this period and are	<u>Winter Grazing – the intensive grazing of dry stock (cattle, deer, pigs, and sheep) between the period of 1 May to 30 September, where the stock are break fed in-situ forage and root vegetable crops.</u>

Page #	Policy # or rule #	Name of policy or rule	Support / oppose	Reason	Relief sought
				being fed supplement so are not necessarily "Winter Grazing". There is no mention in the plan about other stock types.	Changes: deletion of the word supplement; addition of the word stock (not just cattle) and root vegetable crops.
6 – 11	Schedule 28	Farm Portal Proxies	Oppose	Modelling uncertainties	Schedule 28 to be populated with modelling assumptions once any issues have been resolved

Name: Glen Smith