

**From:** [gandvpatterson@farmside.co.nz](mailto:gandvpatterson@farmside.co.nz)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Monday, 9 September 2019 2:01:00 PM

---



## Submission on Proposed Plan Change 7 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 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: Vincentine Johanne Patterson Phone (Hm): 03 6143725  
Organisation\*: \_\_\_\_\_ Phone (Wk): \_\_\_\_\_  
\* the organisation that this submission is made on behalf of  
Postal Address: 41 Mt Nimrod Road Phone (Cell): n/a  
RD14 CAVE 7984 Postcode: 7984  
Email: gandv.patterson@farmerside.co.nz Fax: n/a  
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: V Patterson Date: 29 August 2019  
(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 my submission in a joint case with others making a similar submission at any hearing

Page 1  
Patterson

(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 it will be for the Council to understand your concerns.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Section 8 Pg 68, 69	8.4.30	Oppose	<p>Livestock exclusion from waterbodies: Hill country farms have many springs which discharge into (or begin) waterways which discharge into rivers, wetlands or lakes. Physically excluding stock is not practical or cost effective to achieve a good environmental outcome as stocking rates are low in an extensive hill country environment.</p> <p>A Farm Management Plan would better address the issue of springs discharging into rivers, wetlands and lakes, rather than a blanket rule, regardless of cost or likely environment impact/outcome.</p>	<ul style="list-style-type: none"> <li>• Recognition that livestock exclusion from springs on non-intensive farms may not always be needed to achieve good water quality. Alternative management practices exist and are used by hill and high country farmers.</li> <li>• The risk assessment for springs and associated management practices can be expressed through a Farm Management Plan, which would be a requirement for a permitted activity or a controlled activity consent, rather than a discretionary activity.</li> </ul>

Add further pages as required – please initial any additional pages.

Page 2  
Patterson



(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>		(3) I seek the following decisions from Environment Canterbury:  <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Section 8 pg 68, 69	8.4.30	Oppose	<p>Livestock exclusion from waterbodies:</p> <p>Springs are not consistently in one place throughout the year - depending on a number of factors including rainfall and watertable levels. How are you expecting high country and hill country farmers to mitigate this issue when the proposed rule is exclusion and potentially coming into place for all farms as a blanket rule.</p> <p>A Farm Management Plan would better address the issue of springs discharge rather than a blanket rule, regardless of cost, or likely environment impact/outcome.</p>	<p>• Recognition that livestock exclusion from springs on non-intensive farms may not always be needed to achieve good water quality. Alternative management practises exist and are used by extensive stocked, high country farmers.</p> <p>• The risk assessment for springs and associated management practices can be expressed through a Management Plan, which would be a requirement for a permitted activity or a controlled activity consent rather than a discretionary activity in Rule 5.69</p>

Add further pages as required – please initial any additional pages.

Page 3  
Patterson

(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 it will be for the Council to understand your concerns.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Section 8 Pg 85	8.5.33	Oppose	Stock exclusion from waterbodies See 8.4.30 decisions →	See decisions for 8.4.30 above
Section 14 Pg 135	14.4.17	Oppose	Nutrient Management Farm Management Plans or Farm Environment Plans are now required for most farms in a "High Runoff Risk Phosphorus Zone". It would be simpler and consistent to apply common area thresholds in Phosphorus Risk Zones and a 10% of total area for cattle discharge. For farms in High Runoff Risk Phosphorus Zones a Farm Management Plan should be required instead of a farm Environment Plan.	• Re-word the provision as follows: "Water Quality outcomes, limits and targets in Tables 14(a) to 14(g) in the Otago - Teanaki - Opihi - Pareora sub-region are achieved by requiring: d. farming activities that include winter grazing of cattle or deer within the High Runoff Risk Phosphorus Zone to demonstrate through their farm Management Plan how active management of the loss of phosphorus, sediment and microbial contaminants to water will be achieved where the area of winter grazing is ≤ 10% of the property."

Add further pages as required – please initial any additional pages.

Page 4  
Patterson



(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>		(3) I seek the following decisions from Environment Canterbury:  <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Section 14 Pg 150	14.5.17	Oppose	Nutrient Management: Farm Management Plans or Farm Environment Plans are now required for most farms. Outside High Runoff Phosphorus Zones, the 10% of farm area approach is already in place so should be continued to manage nitrogen losses. It would be simpler and consistent to apply common thresholds. For farms in a High Runoff Risk Phosphorus Zone a Farm Management Plan should be required instead of a Farm Environment Plan as it will be easier and cheaper to develop and maintain, and will address the issues of concern.	Reword the provision as follows: <ul style="list-style-type: none"> <li>"The use of land for a farming activity on a property greater than 10 hectares in area is a permitted activity provided the following conditions are met:</li> <li>4. The area of the property used for winter grazing of cattle (within the whole zone) or deer (within a High Runoff Risk Phosphorus Zone) is <math>\leq 10\%</math> of the area of the property."</li> </ul>

Add further pages as required --please initial any additional pages.

Page 5  
Patterson