From: gandy.patterson@farmside.co.nz
To: Mailroom Mailbox
Subject: Plan Change 7 to the LWRP Submission
Date: Monday, 9 September 2019 2:01:20 PM
Submission on Proposed Plan
Change 7 to the Canterbury
Land and Water Regional Plan

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: Graham Bradley Patterson
Phone (Hm): 63 6143725
Phone (Wk): As Above

Organisation*: Aho & Partners
Postal Address: 41 Mt Almrood Road
BD14, Cave 7984
Email: graham.patterson@ahoande.co.nz
Fax: N/A

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

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: 29 August 2019

(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.
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 8 8.4.30</td>
<td>pg 68, 69</td>
<td>Oppose</td>
<td>Livestock exclusion from waterbodies: Hill country farms have many springs which discharge into or begin watercourses 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. * 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. * The risk assessment for springs and associated management practices can be expressed through a Farm Management Plan which would better address the issue of springs discharging into rivers, wetlands and lakes, rather than a blanket rule regardless of cost or likely environmental impact/disruption.</td>
</tr>
</tbody>
</table>

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

Page 2

Pederson
The specific provisions of the Proposed Plan that my submission relates to are:

<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/Point</th>
<th>Oppose/support (In part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 8 8.4.30</td>
<td>pg 63, 69</td>
<td>Oppose</td>
<td>Livestock exclusion from waterbodies: Springs are not consistently in one place throughout the year - depending on a number of factors including rainfall. High country and hill country forage is used by extensive farmers to mitigate this issue when the proposed rule is exclusion and potentially coming into place for all farms as a blanket rule.</td>
</tr>
</tbody>
</table>

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.)

- Recognition that livestock exclusion from springs on non-intensive farms may not always be needed. Alternative management practices exist and are used by extensive farmers.
- 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 (instead of a blanket rule, regardless of cost, impact and outcome).
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 8, Pg 85</td>
<td>8.5.33</td>
<td>Oppose</td>
<td>Stock exclusion from waterbodies See decisions for 8.4.30 above</td>
</tr>
<tr>
<td>Section 14, Pg 155</td>
<td>14.4.17</td>
<td>Oppose</td>
<td>Nutrient Management Farm Management Plans or Farm Environment Plans are revised to include Water Quality outcomes in a &quot;High Runoff Risk Phosphorus in the Okai-teura-Ophiu Zone&quot;. It would be simpler and consistent to apply common achieved by requiring:</td>
</tr>
</tbody>
</table>

- Reword the provision as follows:
  - Revision activities that include winter grazing of cattle or total area for cattle elsewhere, impacts with the High Runoff Risk Phosphorus Zone to demonstrate through their Farm Management Plan how active management of the loss of phosphorus seduced and microbial contamination will be achieved where the area of winter grazing is ≤ 10% of the property.

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

Patterson
(1) The specific provisions of the Proposed Plan that my submission relates to are:

<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 14.5.17</td>
<td>Oppose</td>
<td>Nutrient Management: Farm Management Plans or Farm Environment Plans are now required for most farms. Outside High Runoff Phosphorus Zones, the 10% of farms also 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 issue of concern.</td>
<td></td>
</tr>
</tbody>
</table>

(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.)

<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 14.5.17</td>
<td>Oppose</td>
<td>Nutrient Management: Farm Management Plans or Farm Environment Plans are now required for most farms. Outside High Runoff Phosphorus Zones, the 10% of farms also 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 issue of concern.</td>
<td></td>
</tr>
</tbody>
</table>

(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.)

<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 14.5.17</td>
<td>Oppose</td>
<td>Nutrient Management: Farm Management Plans or Farm Environment Plans are now required for most farms. Outside High Runoff Phosphorus Zones, the 10% of farms also 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 issue of concern.</td>
<td></td>
</tr>
</tbody>
</table>

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