

**From:** [Keith Orange](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** "Plan Change 7 to the LWRP Submission"  
**Date:** Tuesday, 10 September 2019 4:56:14 PM

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Good afternoon

I have prepared the attached submission re Plan Change 7 to the LWRP.

Sincerely

Keith A Orange

# 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:** Keith Alexander Orange

**Phone (Hm):** 03 6937 033

**Organisation\*:** Great Southern Deer Farms Ltd

**Phone (Wk):** \_\_\_\_\_

\* the organisation that this submission is made on behalf of

**Postal Address:** 24 Guthrie Road RD 21 Geraldine 7991

**Phone (Cell):** 021 391 870

**Postcode:** \_\_\_\_\_

**Email:** keith@downlandsdeer.co.nz

**Fax:** \_\_\_\_\_

**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:** \_\_\_\_\_

**Date:** 10-09-2019

(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

(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	14.4.15	Oppose		
page 134		Livestock exclusion from Waterbodies (Orari - Opihi - Pareora Zone)		Recognition that livestock exclusion from creeks
		I feel 'Plan Change 7' requires a clearer definition of 'Intensive Farming' with		may not always be needed to achieve good water
		relation to Hill country/Tussock blocks. Most of these cattle grazing/deer		quality. Alternative management practices exist
		breeding blocks situated in the foothills are by definition very lightly stocked ie:-		and are used by deer farmers.
		one hind or half a cow equivalent per hectare. In stock units 2.5 - 3 stock units		
		per hectare. This density (or lack of) creates ZERO contamination to the fast		
		running, gravel based streams. Plan change 7 therefore needs to state clearly a		
		cap of say 5 - 6 stock units per hectare and be exempt from being forced to		
		fence these waterways from livestock. If any doubt is declared, testing streams		
		be required as per our Farm Environment Plan. If this clarity is not forthcoming		
		future blocks could be penalised unfairly. A rough rule of thumb to fence a hind		
		block would be in excess of \$30 per meter. This would create an unfair burden		
		on any hill country deer or beef farmer who only wants to farm his animals in a		
		natural environment to produce income from overseas funds by sale of red		
		meat. Example: 3 kilometers of deer fencing @ \$30 per meter = \$90,000 x 2 to		
		fence both sides of creeks = \$180,000 plus the alarming disturbance to native		
		tussocks, native bush, aquatic life and the ground surrounding the creeks.		Hopefully common sense will prevail!

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