

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: angus.wendy@xtra.co.nz
Subject: Plan Change 7 to the LWRP Submission - Angus Wilson
Date: Friday, 13 September 2019 1:49:29 PM

Dear Sir/Madam

Please find attached a Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan in respect of our client Angus Wilson.

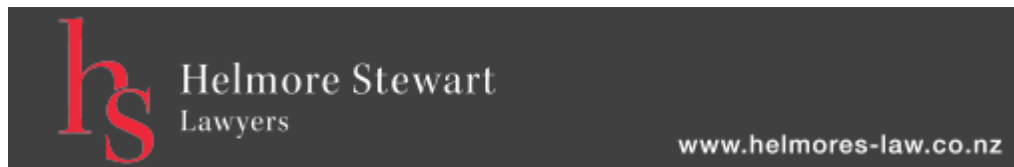
Regards

Grant Edmundson

Partner

Email: grant@helses-law.co.nz

Helmore Stewart Lawyers
9 Good Street, P O Box 44, Rangiora, North Canterbury, New Zealand, 7440
T +64 3 311 8008 | F +64 3 311 8011 www.helses-law.co.nz



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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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
PO Box 345
Christchurch 8140

Full Name: Angus Wilson

Phone (Hm):

Organisation*:

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address:

Phone (Cell): 027 447 6560

56 Leggitts Road, Waikuku

Postcode: 7473

Email: angus.wendy@xtra.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 completion 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: A. W. M. Wilson

Date: 13/9/2019

(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 address 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 other making a similar submission at any hearing

AW

Schedule 1

Submission in regards to Plan Change 7 to the Canterbury Land and Water Regional Plan

This submission has been prepared and is submitted by me, Angus Wilson in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am duly authorised to make this submission.

1. Address: 56 Leggitts Road, Waikuku, Waimakariri District, Canterbury
- Land Use: Mixed use (winter grazing, beef finishing, cropping and beef trading) farming in the Coastal Zone of the Plan.
- Irrigation: Spray irrigation.

Reasons for Submission

- A. I represent the third generation farming in Waikuku and have had 30 years of farming experience. We have lived, farmed and socialised in a community for 25 years and continue to be involved with community groups and schools.
- B. In my view, the farming community is intrinsically linked to the vibrancy and wellbeing of rural towns. It is therefore important to ensure that the Plan is measured to achieve success both in terms of water quality outcomes, but also, to ensure the ongoing viability of the communities in which we farm.
- C. Historically, we have fenced off waterways, installed more stock water troughs and have initiated riparian plantings across the farm. In addition, we have also applied seaweed by-product on the land to enhance soil structure and nutrient in an organic manner.

Submission

It is submitted:

Submission 1

Although we are not directly affected, it is our view that a single Nitrate Priority Area should be adopted across the district and for the sub-areas to be removed. This is important as the district does not want to unnecessarily discriminate between sets of farmers where the science is not exact and does not precisely enforce the Plan.

If this level of differentiation is to take place, then adequate provision should also be made for lifestyle subdivisions, etc.

Submission 2

The Taranaki Creek which flows through the farm is very slow in terms of water flow and it is submitted that this is more as a result of the change in the ground substructure as a result of the earthquakes than anything else. This causes sediment build-up which is not attributable to any particular farming operation. There are also hundreds of Canadian geese in the lower catchment area and their effluent contribution is not insignificant.

Concluding Remarks

A strong collective collaboration is required by all stakeholders to achieve water quality outcomes. A "divide and conquer" mentality based on artificial boundaries in the Nitrate Priority Area is not conducive to achieving long term goals.

Thank you for your time.

(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)	
Section & Page Number	Sub-section / Point	Oppose / Support (in part or full)	Reasons
	Policy 8.4.25 – 8.4.29 Rules 8.5.21 – 8.5.29 Table 8-9 (Nutrient Management Provisions)	Oppose	Ensure the provisions and reduction regime takes into account the significant reductions that may be required even to reach Baseline GMP Loss Rate (or alternatively, delete the references to "Baseline GMP Loss Rate" and replace with "Good Management Practice"). Delete the requirement for reductions in Table 8-9 after 1 January 2030 (or 1 January 2040 if it can be demonstrated as a part of any hearing process that the extent of reductions required is achievable and reasonable). Table 8-9 should also not differentiate between areas.

Add further pages as required - please initial any additional

See PTO.

AW

(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	
	Policy 8.4.25 – 8.4.29 Rules 8.5.21 – 8.5.29 Table 8-9 (Nutrient Management Provisions)	Oppose	Ensure the provisions and reduction regime takes into account the significant reductions that may be required even to reach Baseline GMP Loss Rate (or alternatively, delete the references to “Baseline GMP Loss Rate” and replace with “Good Management Practice”). Delete the requirement for reductions in Table 8-9 after 1 January 2030 (or 1 January 2040 if it can be demonstrated as a part of any hearing process that the extent of reductions required is achievable and reasonable). Table 8-9 should also not differentiate between areas.	The starting point for reductions is unclear. The reductions set out in Table 8-9 are not achievable and will have severe implications for farming. The focus of Table 8-9 on requiring reductions on farming alone is also not consistent with the wider community all working towards maintaining or improving water quality.

Add further pages as required - please initial any additional pages