

Tamina Roberts

From: Sonia Booth <sonia@propertybrokers.co.nz>
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Cc: Sonia & Rodney Booth; Susan Goodfellow
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Please find attached Submission on Proposed Variation 1 to the Canterbury Land & Water Regional Plan.

Kind regards,

RODNEY BOOTH



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Submission on Proposed Variation 1 to the Canterbury Land and Water Regional Plan

To: Canterbury Regional Council
By email: mailroom@ecan.govt.nz

Name of Submitter:
Mr. Rodney Booth
532 Steeles Road
Hororata

Background

My name is Rodney Booth and I am a shareholder and owner of Dunfield farm that operates in the Hororata/Te Piritā area on the Central Canterbury Plains, within the Selwyn Waihora Zone

Dunfield property is located within the Stage 1 area of the Central Plains Water Scheme and the company owns shares (both ordinary shares and construction shares) in Central Plains Water Ltd.

Dunfield has supported and contributed to funding CPWL to obtain the consents that include detailed conditions around the management of farm nutrients and the provision of farm environmental plans. I am supportive of the improvements required to farm management practices to support the water quality improvements sought through the v1 pLWRP. In fact, many of the implementation strategies sought are included in CPW's existing consents.

I and other CPW shareholders have and are continuing to invest considerable sums of money in the development of the scheme and on-farm infrastructure to be ready to take water by 1st September 2015. The Proposed Plan puts the scheme's viability at risk.

Submission

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

Submission Point 1:

Of key concern as a CPW shareholder is the impact that the proposed total scheme nitrogen allocation on the viability of the scheme.

Table 11(j) Irrigation Scheme Nitrogen and Phosphorus Limit *(Proposed nitrogen allocation and timeframes)*

Relief Sought:

Until such time that the scheme nitrogen allocation can be validated, and the matrix of good management is defined, replace the scheme allocation with a method requiring the Council to commit to the development of the Good Management Practice Nitrogen and Phosphorous Loss Rates for inclusion in a subsequent notified plan variation (with an expectation that those rates will be complied with from 2017).

Reasons:

1. I have concerns that the figures presented in Table 11(j) are based on assumptions of 2009 to 2013 irrigated and dryland baseline leaching for CPW shareholder land.
2. Providing an allocation to the scheme that has not been confirmed on a farm by farm basis is unacceptable.
3. The viability of the scheme is at risk until this number is confirmed.
4. The matrix of good management will not be available until mid-2015 and yet we are required to accept the aggregated scheme allocation included in Table 11(j) without this industry tested and developed set of numbers.
5. There is a risk of creating tension between farmers on heavy and light soils and between irrigators and non-irrigators as perceptions could arise of some shareholders subsidising others.
6. There is a risk that there will not be enough Nitrogen to enable the full scheme to develop, given that the scheme will be developed in stages.
7. I have concerns that the mitigation measures that underpin the scheme allocation include measures that are not available today, for example DCD's. The affordability of the mitigation proposals has not been adequately addressed or accounted for.
8. I am concerned that the impact on the scheme viability could impact on the future of the family scale farm which will not be viable if the Nitrogen allocation is insufficient. This is likely to result in more and larger corporate farms developing within the scheme area. This has significant adverse effects for the local communities. Like me, many of the family farmers have been in the communities for generations. The fabric of a community is significantly altered as a result of corporate farms that bring in migrant workers that have no or very little vested interest in integrating into the local community within which they work. This impacts on a wide range of community based resources such as schools and local businesses.

Submission Point 2:

Policy 11.4.31 (page 4-8)

The proposed policy seeks to prohibit in-stream damming of the full flow on the main stem of the Selwyn River/Waikirikiri and the Waianiwaniwa River above its confluence with the Selwyn River/WaiKirikiri.

Relief sought:

Oppose and delete policy

Reasons:

1. Efficiently irrigated agriculture requires high water supply reliability.

2. The reliability of the consented water take for the Central Plains Water scheme is around 70% without storage. The scheme is therefore dependent on supplies of stored water to achieve the 95% reliability that has underpinned the schemes economic viability.
3. The Selwyn-Waihora Zone Committee Implementation Programme (ZIP) Addendum recommendation 2.11 relating to water storage 'red flagged' a number of key issues that the developers of any water storage in the Selwyn and Waianiwaniwa would have to consider. The Zone Committee did not go as far as to recommend the prohibition of damming of the main stems.
4. The original CPW scheme proposal included the Waianiwaniwa dam. This was withdrawn before the hearing. Any future proposal would be subject to its own consent process and could be either granted or declined.
5. Storage sites within the Selwyn Waihora Zone will be important for the development of the Central Plains Scheme but might also be important in storing water for the wider Canterbury Region.



Rodney Booth