Janel Hau

From: Lucy Johnson <Lucy.Johnson@synlait.com>
Sent: Friday, 21 March 2014 3:21 p.m.
To: Mailroom Mailbox
Cc: Stephen & Nicole Reid; frank.robyn@xtra.co.nz; Lucy Johnson
Subject: TRIM: Submission - Variation 1
Attachments: Lamborn variation 1 submission.pdf; Scan_20140316 (4).jpg

Categories: Purple Category
HP TRIM Record Number: C14C/43827

Hi Ecan,

Please find attached a submission to Variation 1 of the pLWRP for the Selwyn-Waihora catchment on behalf of Frank and Robyn Lamborn.

Many Thanks
Lucy

Lucy Johnson
Environmental Manager

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Submitter ID:

File No:

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

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 21 March 2014 to:

Freepost 1201 Variation 1 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Frank and Robyn Lamborn

Phone (Hm):

Organisation*:
* the organisation that this submission is made on behalf of

Phone (Wk):

Postal Address: 225 Walkers Road, RD7, Christchurch

Phone (Cell): 0272340014

Postcode: 7677

Email: Frank.robyn@xtra.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:** 16/3/14

(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 your submission in a joint case with others making a similar submission at any hearing

SUBMISSION TO ENVIRONMENT CANTERBURY REGARDING PROPOSED VARIATION 1 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN

Full names: **Frank and Robyn Lamborn**

Occupation: Dairy farmers

INTRODUCTION

We manage two farms in the Greendale area. One is situated on the corner of Telegraph and Clintons Road, called Grace Dairies, which is approximately 120 ha in size. We have farmed this property for 12 years, which we converted to dairy 10 years ago. Four hundred and twenty cows are currently milked on the property.

The other property is at 283 Clintons Road, called Canaan Farm. We have owned the bulk of the property for eight to nine years using 70 ha for a dairy grazing unit. We bought an additional 70 ha which had been farmed for sheep, and now milk 500 cows. This is the first milking season after the conversion to dairy.

We have over a thirty year history of dairy farming, ranging from five years sharemilking in Northland to owning a property in Dargaville, which we farmed for six years. We then moved to the South Island where we have been for the last 20 years in Lowcliff, then Dunsandel before settling in the Greendale area. We have moved away from being involved with the day-to-day operation of the two farms, such as milking, but we are still heavily involved in the calving and breeding of the cows, and the overall management of our farming operations on the two farms.

We have consents for two deep wells on each of our properties which we use to source water for irrigation on our properties. We also have consents for dairy shed effluent pond and for spreading the waste on to the farms.

Both of the farms are located just inside the Central Plains Water (CPW) scheme but we have no plans, at this stage, to become part of the scheme. Neither of the properties have any lakes or rivers in their proximity.

We are both concerned about the “dirty dairying” label that is bandied about with regard to dairy farming. We are conscious of the effects that farming can have on the environment so we are mindful of this when we run our operation. Our aim is to have a sustainably run operation that our children, grandchildren, and other generations can continue to farm. Therefore we are supportive of plans to manage the catchment at a regional level but not to detriment of the viability of our farming operation.

COMMENTS ON PROPOSED VARIATION 1 OF THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN PROVISIONS

We OPPOSE all of the provisions in the proposed variation 1 of the proposed Canterbury Land and Water Regional Plan (pV1 pLWRP) due to the following reasons:

1. The pV1 pLWRP is unduly restricting dairy farming practices over all other farming practices in the area.
2. There has been insufficient time to be able to review the myriad of reports used to set the policies, rules, and limits in the pV1 pLWRP. There are still many uncertainties, such as around nitrogen limits, and yet strict limits are being imposed which have significant financial consequences to farming operations.

SPECIFIC SECTIONS OF THE PROPOSED V1 PLAN

Without prejudicing our opposition to all the provisions of the pV1 pLWRP given above, we highlight some provisions further below, which are of particular interest to us:

POLICIES

Policy 11.4.13

- **We support** the requirement for Farm Environment Plans (FEP) given in part (a). We agree that it is good farm management to have a FEP and that we need to have an environmental aware focus of our operation. We do not think it should not be to the detriment of our businesses either.

- **We oppose** to part (b). It is not clear what the "Good Management Practice Nitrogen and Phosphorus Loss Rates for the properties baseline land use" means.

  Relief sought: Need an actual definition of what is expected of the farmers or clear reference to where this information can be sought, such as to policies in 4.40 and 4.41, for example. The definition in section 11.1A *Selwyn-Waihora Sub-regional Section Definitions* is not sufficient either.

Policy 11.4.14

- **We oppose** to the 30 % nitrogen limit reduction for discharges above 15 kgN/ha/yr imposed for dairy farming. We understand that this has been done purely on an economic basis. We argue that this is not fair. Dairy is currently doing well now but it has not been in that position in the past, and who knows what is likely to happen in the future?

  Relief sought: Delete the percentage differences across all farming types and have one percentage that is the same for all. If this is not satisfactory, as an alternative, re-evaluate the percentages more equitably to ensure a fairer way to plan for N loss reduction.

Sustainable Use of Water and Improved flows (Policies 11.4.21 to 11.4.32)

- **We oppose** to the policies in this section, particularly the policies listed below which seek to do the following:
  - Restrict the transfer of water permits (policies 11.4.22, 11.2.24, and 11.2.25)
  - Reallocation of water to existing resource holders at a rate and volume that reflects demonstrated use (policy 11.4.23)

  The water take permit(s) are an asset to the farm therefore any restriction on ability to renew these permits to the required level for operation will devalue that farm as a business unit. The consents that are the first in line for renewal will be the ones that will be most disadvantaged.

  Consequently, allocating volume and/or rate of water permits to farms by demonstrated use will mean that there is no incentive for farmers to wisely use their water otherwise they will find their limit reduced. Water metering is not currently enforced so there is not a reasonable data set for use that is currently being used by farmers, which would more likely demonstrate actual use.

  There is also so much variability regarding the quantity of the water resource actually available. Significant restriction of water will be mean significant financial and operational problems for farm viability. If CPW works as planned then it is possible that there will be more water available therefore the requirement to "claw" back water will be reduced or not necessary.

  Relief sought:

  1. Allow transfer of water permits without restriction.
  2. Delete policy 11.4.23. If this is not satisfactory, then set a start date for the policy after a reasonable time after accurate water metering data has been obtained for all water takes.

RULES

Nutrient Management – Sediment and Microbial Contaminants (Rules 11.5.6 to Rules 11.5.13)

- **We oppose** to the requirement for the need to obtain a resource consent from 2017, if the nitrogen loss calculation is above 15 kgN/ha/yr. A limit of 15 kgN/ha/yr is an arbitrary limit

so it is overly restrictive to enforce this limit thereby requiring a resource consent for farms with nitrogen losses above these limits.

Relief sought: Delete all of the rules in this section requiring resource consents. If this is not satisfactory, then move the date from 2017 to a much later date when more accurate results of nitrogen losses can be obtained for each farm.

Taking and Use Surface water and Take and Use Groundwater (Rules 11.5.32 to 11.5.41)

- **We oppose** to the rules listed for the same reasons as specified in our opposition to the corresponding policies given above under **Sustainable Use of Water and Improved flows (Policies 11.4.21 to 11.4.32)**.

Relief sought:

1. Allow transfer of water permits without restriction.
2. Delete all rules relating to policy 11.4.23. If this is not satisfactory, then set a start date for the policy after a reasonable time after accurate water metering data has been obtained for all water takes.

Schedule 24 – Farm Practices

We generally support the inclusion of the new Schedule 24 – Farm Practices.

We already use fertiliser spreading company for a proportion of our spreading and use our own calibrated machine for any fertiliser spreading we apply ourselves. We already do soil nutrient tests. Issue we have with the schedule is as follows:

(a) Nutrient management

Part (ii)(b) the Spreadmark Code of Practice does not have a version number or review date.

Relief sought: Include version number or review date.

We wish to be heard in respect of our submission.

Our contact details are as follows:

Frank and Robyn Lamborn

225 Walkers Road

RD 7

CHRISTCHURCH 7677

Mobile: 027 2340014

Frank.robyn@xtra.co.nz

Signed:

Dated: