

Make Submission

Consultee	Mrs Susan Thornley (52180)
Email Address	thornleys@xtra.co.nz
Address	248 Hawkins Road PO Box 74 Hororata 7544
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-96
Response Date	21/03/14 12:23 PM
Consultation Point	7. MANDATORY INFORMATION - HAVE YOUR SAY (View)
Status	Submitted
Submission Type	Letter
Version	0.2
To Be Heard	

Please select the appropriate option from the following: I DO NOT wish to be heard in support of my submission; or

If so

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Address	248 Hawkins Road PO Box 74 Hororata 7544
Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-62
Response Date	21/03/14 10:41 AM
Consultation Point	Section 11 - Selwyn Waihora Section 11 - Selwyn Waihora (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

S11 talks about the lag effect in the transport of nitrogen in the groundwater system of 10 - 30 years. I appreciate this is a difficult area of science to be exact about, but it makes it difficult to really know where the environmental degradation has really come from. Is it actually longer than 30 years, when there was far less environmental appreciation with particular regard to farming operations near the lakes and discharges to drains and waterways? If it takes so long for nutrients to reach our groundwater, the vast improvement in farming practices over the past decade even will have alleviated a lot of the previous leaching. As this is the basis of the whole variation and plan for the Selwyn Waihora catchment, it seems to be a wobbly basis to plan the whole future upon - especially when the next point is about the overall vision for Te Waihora is "maintaining the prosperous land-based economy and thriving communities". This would be at extreme odds with some of the nutrient and farming policies that follow in Variation 1, and possibly detrimental to Canterbury and then all NZ.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

It is a great goal to want to improve the health of our environment, but I don't believe it should be restrictive that it reduces the ability of individuals to farm with sound practices. Intensification of our existing plains is a necessity for Canterbury, and wider New Zealand, to support the life of all New Zealanders. I believe progress is about setting nutrient limits around good farm management practices and systems for each farm, rather than lumping everyone together as a single whole zone.

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Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-63
Response Date	21/03/14 10:43 AM
Consultation Point	11.4.12 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

11.4.12 (a) to not exceed the nitrogen baseline where a property's nitrogen loss is more than 15 kg N/ha/yr is difficult to accurately measure. The overseer model is just that - a model, plus it is an everchanging model so the figures will consequently always be moving. This clause makes no allowance for farms that were under development during the baseline period, where substantial investments in infrastructure and on farm development were occurring to bring farms up to optimal production with modern technologies. Setting a baseline makes no allowance for those under current and ongoing development.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Farming baselines should be developed around "good farming practices" and modern technology rather than a nominal figure. I would like to see guidelines for our farming, not a single figure for nutrient losses. Set ideals around irrigation type, data recording, aquaflex readings, fencing and

farming distances from waterways, effluent discharges and all those kind of variables that can be monitored.

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Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-64
Response Date	21/03/14 10:49 AM
Consultation Point	11.4.14 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

I oppose 11.4.14 with variable industry percentages for further reduction in nitrogen loss rates from 2022. Penalising different industries at different rates for farming in the same zone is inequitable. There are people who have already made huge investments in infrastructure and development to operate their farm efficiently, and yet they will still be penalised by the same percentage as those who operate far less environmentally efficiently. Currently operating with good farming systems will now ultimately penalise those people in the future. The aim for ECan should be to reduce intensification in the future on unsuitable soils and with undesirable farming practices. It should be aiming for all farmers to be operating with good practices for irrigation, fertiliser, discharges and erosion prevention, etc. Knowing that results of our actions can take 10-30 years to be seen in groundwater, who is to know that our current farming systems have already improved our future groundwater health.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Farm environment plans are a good starting point with Overseer or other developed models to record nutrient losses. Plans and policies should be more about optimal farming practices to minimise our effects on the environment, and not an absolute figure of reductions based on an imprecise and changeable model. Remove all the percentage for reduction, and replace with sustainable farming practices and procedures.

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Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-65
Response Date	21/03/14 10:50 AM
Consultation Point	11.4.16 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

11.4.16 states from 2037 no farm shall leach more than 80 kg N/ha/pa. This seems a great objective, but only if Overseer was an excellent model where we knew the output figures were really accurate and relevant.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

If this clause must stay, I would like added to this clause "or such limit other than 80 given development and refinement of nitrogen leaching measurement techniques".

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Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-66
Response Date	21/03/14 10:54 AM
Consultation Point	11.5.7 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

11.5.7 makes no allowance for farms that were under development during the baseline period. For infrastructure and development occurring during this time, the current nutrient discussions did not exist. The proposed variations would now effectively limit those under development to levels that would be unsustainable relative to their time and financial investment. Development during the baseline time is generally of a high efficiency product, such as pivot irrigation, and the substantially greater cost of that investment will now often be too much relative to the potential nutrient limit for a farm if these baselines hold and then future reductions must occur.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

I would like to see an option for people to prove their farm was under development during the baseline period 2009-13 and even into the 2013-14 season. This would allow a higher baseline to be established, putting them on more level playing ground with those who had already operated established farms during the base period.

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Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-67
Response Date	21/03/14 10:55 AM
Consultation Point	Table 11(i): Catchment Target and Limits for Nitrogen Losses from Farming Activities, Community Sewerage Systems and Industrial or Trade Processes (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

11.7.3 table 11(i) sets limits for nitrogen load in Selwyn Waihora zone. These figures are understandably difficult to calculate and are based on models that are themselves under ongoing development. I find it difficult to set absolute figures based on a variable science, and also in face of recent and ongoing extreme growth in farming, business and residential development in the Canterbury area.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

The clause should remove specific limits and state all new farming, commercial and residential development must be undertaken with the current best practice building, operating systems and technology available.

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Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-68
Response Date	21/03/14 10:58 AM
Consultation Point	Table 11(j): Irrigation Scheme Nitrogen and Phosphorus Limits (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

11.7.3 table 11(j) requires a further 10.5% reduction of nitrogen and phosphorus in the Central Plains Water Scheme area from 2022. The scheme only becomes operational from summer 2015, and 2017 or later for others, during which time farms will still be under development. The CPW scheme has been many years in development, starting at a time when these nutrient discussions did not exist. Extensive time and financial investment has been made across the region, and the current absolute setting of figures places the whole scheme in jeopardy. The proposed 2017 limit, based on models and scientific assumptions, may already be limiting the scheme from its full potential, so further reductions by 2022 will absolutely hinder the scheme. People are already wary of investing in the later parts of the scheme now as it may not be financially viable now to invest in land and irrigation. It needs to be remembered also that on farm irrigation development will already be of efficient water application systems, and further reducing that in 2022 is not likely to be feasible for some.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Remove the absolute nitrogen figures, or at least add to table 11(j) "or other figures as can be reasonably and accurately calculated by improved modelling or other approved calculation techniques"

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Event Name	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mrs Susan Thornley
Submission ID	V1pLWRP-69
Response Date	21/03/14 11:00 AM
Consultation Point	Schedule 10 - Reasonable Use Test (View)
Status	Submitted
Submission Type	Web
Version	0.1

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Seasonal irrigation demand should be based on full 10 years, as that is what a farm actually needs. With modern application of water, measurement of soil moisture and rate of take, and overall environmental awareness, there is already sufficient knowledge to use water appropriately to the soil requirements and weather conditions. Nobody wants to use water unnecessarily - we don't want waterlogged soils or wasting of water, plus there is a time and financial cost to apply water.

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I seek the following decisions from Environment Canterbury:

Removal of the 8 and a half years out of 10 seasonal irrigation demand, replaced with "seasonal irrigation demand as required to farm efficiently and justified by knowledge and recording of soil moisture conditions and soil type".