

Gay Gibson

From: Grant & Jan Early <grant.jan@xtra.co.nz>
Sent: Friday, 24 October 2014 3:02 p.m.
Subject: Early submission on Variation 2 to the proposed Canterbury Land and Water Regional Plan
Attachments: CCE24102014.pdf; Variation 2 submission.docx

To whom it may concern

I have attached our submission twice. Once on Form 5 and again as a Word document. I hope one of these submissions will be sufficient and be accepted by Environment Canterbury.

Regards Jan and Grant Early

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FOR OFFICE USE ONLY

Submission on Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan

Submitter ID:

File No:

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 24 October 2014 to:

Freeport 1201 Variation 2 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Jan Rosemary Early + Grant Joseph Early Phone (Hm): (03) 3036213
Organisation*: _____ Phone (Wk): (03) 3036213
* the organisation that this submission is made on behalf of
Postal Address: 8 RD, Ashburton Phone (Cell): 021514157
Email: grant.jan@extra.co.nz Postcode: 7788
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: [Signature]

Date: 23/10/2014

(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

(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.)		(3) I seek the following decisions from Environment Canterbury: (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.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
13.1 A and associated N loss calculations and Nitrogen baseline and its use in rules 13.5.13 to 13.5.20	Definitions	Oppose.	Does not take into account development including dairy conversions prior to 2009 and land intensification including non-irrigated dairy support and cropping. For example, newly converted dairy operations (eg 2008, prior to proposed baseline period) who were increasing in cow numbers due to as economics allowed, to reach optimum stocking rate for land and capital infrastructure and/or increased cow numbers due to the addition of new irrigation development during this period. Their Nitrogen loss levels would have increased each progressive year until fully developed. The definition also does not take into account pest infestations such as clover root weevil where additional Nitrogen would need to be applied (because clover would be	The baseline should be at least the highest from the 2009-2014 period or preferably the baseline should be established at GMP levels once GMP is defined. Exceptions need to be made in extra-ordinary circumstances. The above would also ^{result in} mean any other consequential changes being made as required due to changes above.

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

[illegible]

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(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.)		(3) I seek the following decisions from Environment Canterbury: (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.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
Part 1 paragraph 3 Scope of Variation 13 Part 5 Planning maps		Oppose.	Consultation and development of plan was based on published boundaries. Final plan has shifted boundary. Water quality attributes of the "Green zone" are being met in the Land and Water Regional Plan (LWRP) so no need to change to "not bare met" (red zone) in the Hinds sub regional plan. The "Green zone" along the Rangitikei river should be allowed to remain as this river is alpine fed with high flood flows and is less susceptible to nutrient run-off due to the flushing effect. The drainage pattern would suggest it is unlikely any nitrate leaching would affect the Hinds and Ashburton rivers. Farmers including ourselves made farming decisions based on the "Green Zone" and are now disadvantaged by the proposed	Revert to consultation boundaries that leaves the "Green zone" along the Rangitikei river.

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

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(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.)		(3) I seek the following decisions from Environment Canterbury: (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.)
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
13.5.10 and baseline land use definitions and Nitrogen baseline and its use in rules 13.5.13 to 13.5.20		Partly support	Supportive of farming enterprises but need to take into consideration that some farming operations also include multiple water sources (eg 2 irrigation schemes) which the plan requires different reduction targets for. Also farming enterprises could include irrigated dairy farming (from 2 or more schemes/or bore), dry-land dairy support, arable etc, all in one farming enterprise. Needs to be one Farm Environmental plan for farming enterprise and clarification over what reduction targets and timelines should be adhered to portions of the farm in order to make compliance more timely and less confusing. We have issue over the use of nitrogen baseline use in the rules	Change the definition of baseline land use and nitrogen baseline to include the words "farming enterprise". Plan needs to specify that scheme loads apply only to portion of farm irrigated by scheme water. Total farm load target needs to be clarified taking into consideration mix of farming and irrigation or lack of that make up farming enterprises. Needs to be one environmental plan for farming enterprise and clarification over what reduction targets and timelines should be adhered to on different portions of the property or enterprise. Any other consequential changes being made as required due to changes above.

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

We fully support. DairyNZ, Federated Farmers and HPLWP submissions
 (Hinds Plains Land Partnership)

Submission on Variation 2 to the proposed Canterbury Land and Water Regional Plan

Clause 6 First Schedule, Resource Management Act 1991

To: Environment Canterbury

Freepost 1201 Variation 2 to the proposed Canterbury Land and Water Regional Plan

By email: mailroom@ecan.govt.nz

Name of submitter: Jan and Grant Early

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Ashburton 7778

03 3036213 and 021 514 157

grant.jan@xtra.co.nz

This submission is on: Variation 2 to the proposed Canterbury Land and Water Regional Plan (Plan)

(Also emailed a copy of this submission on the Environment Canterbury Form 5: submissions on a publicly notified proposed Policy Statement of Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991, in case this submission was not valid in this form)

Section & Page No	Sub section/pt	Oppose/support In part or full	Reasons	Seek following decisions
1. 13.1A:	Definitions-Baseline Land use and associated N loss calculations and Nitrogen baseline and its use in rules 13.5.13 to 13.5.20	Oppose	<p>Reasons: Does not take into account development including dairy conversions prior to 2009 and land intensification including non-irrigated dairy support and cropping. For example, newly converted Dairy farm operations (eg 2008, just prior to proposed baseline period) who were increasing in cow numbers as economics allowed, to reach optimum stocking rate for land and capital infrastructure and/or increased cow numbers due to the addition of new irrigation development during this period. Their Nitrogen loss levels would have increased each progressive year until fully developed.</p> <p>The definition also does not take into consideration pest infestations such as Clover Root weevil where additional Nitrogen would need to be applied (because clover would be depleted) which could take the farm operation over their nitrogen baseline levels</p> <p>Seek following decisions: The baseline should be at least the highest from the 2009-14 period or preferably the baseline should be established at GMP levels once GMP is defined. Exceptions need to be made in extra-ordinary circumstances. Any other consequential changes being made as required due to changes.</p>	
2. Part 1 Paragraph 3 Scope of variation & 13 Part 5 Planning maps		Oppose	<p>Reasons: Consultation and development of plan was based on published boundaries. Final plan has shifted boundary. Water quality attributes of the “Green Zone” are being met in the Land and water regional plan so no need to change to “not being met” (red zone) in the Hinds sub regional plan. The “Green zone” along the Rangitata River should be allowed to remain as this river is</p>	

alpine fed with high flood flows and is less susceptible to nutrient runoff due to flushing effect. The drainage pattern would suggest it is unlikely any nitrate leaching would affect the Hinds and Ashburton Rivers. Farmers including ourselves made farming decisions based on the Green zone and are now disadvantaged by the proposed boundary changes

Seek following decisions: Revert to consultation boundaries that leaves Green Zone along Rangitata River.

13.5.10 and baseline land use definition Partly support
and Nitrogen baseline and its use
in rules 13.5.13 to 13.5.20

Reasons: Supportive of farming enterprises but need to take into consideration that some farming operations also include multiple water sources (eg 2 irrigation schemes) which the plan requires different reduction targets for. Also farming enterprises could include irrigated dairy farming (from 2 or more schemes or bore), dry-land dairy support, arable etc, all in one farming enterprise. Needs to be one Farm Environmental plan for farming enterprise and clarification over what reduction targets and timelines should be adhered to portions of the farm in order to make compliancy timelier and less confusing. We have an issue over the use of “nitrogen baseline” use in the rules.

Seek following decision:

Change the definition of baseline land use and nitrogen baseline to include the word “farming enterprise”. Plan needs to specify that scheme loads apply only to portion of farm irrigated by scheme water. Total farm load target needs to be clarified taking into consideration mix of farming and irrigation or lack of that make up farming enterprises. Needs to be one Farm Environmental plan for farming enterprise and clarification over what reduction targets and timelines should be adhered to on different portions of the property or enterprise. Any other consequential changes being made as required due to changes.

Finally:

Fully support DairyNZ, Federated Farmers, Hinds Plains Land & Water Partnership (HPLWP) submissions