Gay Gibson

From:	Grant & Jan Early <grant.jan@xtra.co.nz></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

	FOR OFFICE USE ONLY
Regional Council Kautihera Taiao ki Waitaha	
Submission on Proposed Variation 2 to the Proposed	Submitter ID:
Canterbury Land and Water Regional Plan	File No:
Form 5: Submissions on a Publicly Notified Proposed Policy S	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:

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	nvironment Canterbury	
	O Box 345	
С	hristchurch 8140	
	2 Esoph	Early
Full Na	ame: Jan Rosanary Early + Grant Esept	Phone (Hm): (03)3036213
	isation*: anisation that this submission is made on behalf of	Phone (Wk): (03) 3036213
	Address: 8 RD, Ashbutan.	Phone (Cell): 021514157
	,	Postcode: 77788
Email:	grant-jan Pictra. co.nz	Fax:
Conta	ct name and postal address for service of person making submit	ssion (if different from above):
-		
Trade	Competition	
compe policy a)	ant to Schedule 1 of the Resource Management Act 1991, a persor tition through the submission may make a submission only if direct statement or plan that: adversely affects the environment; and does not relate to trade competition or the effects of trade competiti	y affected by an effect of the proposed
Please	e tick the sentence that applies to you:	
IT I	could not gain an advantage in trade competition through this submis	sion: or
	could gain an advantage in trade competition through this submission	
14-11-12-1	you have ticked this box please select one of the following:	
	I am directly affected by an effect of the subject matter of	
	<u>am not</u> directly affected by an effect of the subject matter	of the submission
Signat	ure: U (July Dat	e: _23/10/2014.
	e of person making submission or person authorised to sign on behalf of person making the submis	
Please no (1) all info	ote: Immation contained in a submission under the Resource Management Act 1991, including names a	nd 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
	n experimental experimental de la constante en la constante de la constante de la constante de la constante de	

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: (<i>Please give precise details for each</i> <i>provision. The more specific you can be the easier</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	it will be for the Council to understand your concerns.)
13.1A	Definitions	Oppose.	Does not take into account development	The baseline should be at least
andassoc	icited N		including driving conversions prior	the highest from the 2009-2014
loss calc	ilations		to 2009 and land intensification	period or preferably the basely
ad Nitve	gen beseling		including non-ivrighted dainy	stand be established at SMP
and its i	se in		support and evopping. For example	, levels once SMP is defined.
rules 13	5.13 to		newly converted dairy operations	Exceptions need to be
13-5-20			leg 2008, prior to proposed beselve	made in extra-ordinary
and and the second s			period) whoweve increasing in and	civamstances.
			numbers due to as economics	,
and the second second second second			allowed, to reach optimum stocky	g The above would also meet
			vate for land and capital when-	Any other consequential dang
			structure and/or increased can	being more as required the
Anne and a second s			numbers due to the addition of	to dranges above.
			new irrigation development	0
			during this period Their Notrogen	
			loss levels would have have see	4
			each progressive year until full	c
			developed. The definition also do	
			not take into account pest intestation	
			such as clover root weevil where	
			additional Nitragen would need to	
			be applied (because clover would b	

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	and we have a second of a second s		depleted) which could take the.	
			form operation over their	
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Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	it will be for the Council to understand your concerns.)	
But 1		Oppose.	Concultation and development of	Revert to consultation	
paragrah 3			plan was based an published	bandavies that leaves	
Scope of			boundaries. Final plan has	the "Green zone" along the	
Variation +			shifted bandary where quality	Rappiteta river.	
13 RA 5			attributes of the "Sveen zone".	30	
Panning			are being met in the Landard		
maps			Water Regional Plan (LWRP) so		
1			no need to drange to not ban	e	
			met" (red zare) in the Hunds		
			sub regional plan. The 'Ska		
			zone" along the Rongitata river		
			should be allowed to remain as		
			this river is alpine feel with		
			high flood flows and is less		
			susceptible to noticed run-off		
nanga ang ang ang ang ang ang ang ang an			due to the flushing effect. The		
			drainage patterinuarial suggest it is	5	
			unlikely any nitrate teaching wards		
			affect the Hind's and Astronatan vivers.		
			Farmers including anyelves made farmin	2	
			deusions based on the "Sizen Zone" and	J	
			ave now disadvantaged by the proposed		

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Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	it will be for the Council to understand your concerns.)
13.5.10 and		Partly support	Supportive of forming enterprises but	ange the definition of baseline
baseline la	d		need to take into consideration	land use and not vegen beginne to
use definit	ans		that some forming operations	mande the words "fearing
and Nitros	gen botteline		also include multiple water	enterprise " Plan needs to
and its us	e in rules		sources (og 2 vrigethan schemes)	specify that schame loads
13.5.13 to	13.5.20		which the plan requires different	apply only to potion of farm
			reduction targets for. Also forming	wrighted by schene water. Total
			enterprises could indude inicated	form logal target needs to be
			dairy farming (from 2 or more	davilied taking into considerati
			schanester bore), dry-kond dairy	
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			farming anterprise Needs to be are	forming enterprises. Needs to
			Forme Environmental plan for	be one environmental plan
			forming enterprise and clarificati	- for knowne enterprise and
			over what reduction targets and	
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			portions of the farm in order to	lines should be adhered to
			make compliancy more timely	an different portions of the
			and less canking.	property or enterprise.
			We have issue over the use of	Any other concernantial dranges
ana any amanin'ny amin'ny amin'	and a sub-state of the state of		nitragen baseline use in the villes	
				to changes above.

We killy support. DrivyNZ, Federated Farmers and HPLWP submissions (Hudis Plans Land roboter) (Hudis Plans Land roboter)

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 8 R D 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)

1. 13.1A: Definitions-Baseline Land use Oppose and associated N loss calculations and Nitrogen baseline and its use in rules 13.5.13 to 13.5.20

Reasons: Does not take into account development including dairy conversions prior to 2009 and land intensification including nonirrigated 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.

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

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.

 Part 1 Paragraph 3 Scope of variation & 13 Part 5 Planning maps

Oppose

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

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 faming 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