

Sharrie Campbell

From: David Clark <valettafarms@ashburton.co.nz>
Sent: Friday, 24 October 2014 4:18 p.m.
To: Mailroom Mailbox
Subject: Submission to Variation 2 Proposed Land and Water Plan
Attachments: Scan0053.pdf

Categories: Orange Category

EC109612
EC112441

Good Afternoon,

Please find attached a submission to the Proposed Land and Water Plan, Variation 2.

Kind Regards,
David Clark.

Valetta Farms Ltd.
884 Mayfield Valetta Road.
R.D.1.
Ashburton, NZ.
7771.

03 303 6132 (home)
03 303 6130 (fax)
0274 955 202 (mobile)
valettafarms@ashburton.co.nz

Valetta Farms Ltd and Valetta Holdings Ltd.

884 Mayfield Valetta Road,

RD1.

Ashburton.

22nd October 2014.

To the Canterbury Regional Council

Submission to the Proposed Variation 2 to the Proposed Canterbury Land and Water Plan.

Our companies support and adopt the submission made by Federated Farmers of New Zealand.

In addition we hold some specific concerns which are details in this submission.

Part 1 Scope of Variation

Submission – Oppose in part.

The movement of the boundary of the Lower Hinds Plains / Hekeao Area northwards to adjacent to the South Branch of the Ashburton River has included **part** of our farming property in this Nutrient Management Zone. In reading the Proposed Variation 2 there is no explanation of mechanism for accounting for or consenting of contiguous farming properties that lie across zone boundaries. Further **Rules 13.5.13 – 13.5.20** require properties to be solely in the Lower Hinds Plains Hekeao Area.

Relief Sought –

We request that provision be made in the plan to allow for properties that are farmed as one entity but sit across zone boundaries to achieve compliance with Nutrient Management Rules and that those provisions treat such properties in a fair and equitable manner.

Rule 13.4.12 and 13.4.13

Submission – Oppose

The reference of a target load 3,400 tonnes of Nitrogen is not justified or explained in this plan and would seemed to be based on a current version of Overseer. A target of this 3,400 written as a specific number does not allow for changes in the Overseer model and when spread over the entire allocation zone is not equitable, nor achievable, when compared to the allocation recently consented to the Rangitata Diversion Race (RDR).

Relief Sought –

Replace the target of 3,400 tonnes with a protocol for assessing the zone load when using the contemporary Overseer version and requiring the use of **one** modeling tool and protocol to be used in the zone for all consenting, regulatory, auditing and monitoring duties.

Rule 13.4.13 (a)

Submission – Oppose.

The requirement for farming properties to remain at or below the calculated Nitrogen Discharge Baseline from the years 2009-2013 is grossly unfair and inequitable when considered with the provision allowing properties undergoing conversion to dairy farming in those years, but not fully operational to set their Baseline at the highest for those 4 years to reflect the expected discharge when fully operational. In my opinion it is unreasonable to require farms undergoing development or intensification during the years 2009-2013 but not converting to dairying, to set their baseline at the average of those 4 years.

Relief Sought –

Allow **all** farming systems undergoing development or intensification in the 2009-2013 years to set their baseline at the highest year's assumed discharge.

Rules 13.5.13 – 13.5.20

Submission – Oppose in part.

Various references are made in these rules as to a requirement for the property to be solely within the Lower Hinds Hekeao Area. Around the boundary of the zone various properties are dissected by arbitrary lines, whereas in reality these properties are farmed as one unit.

Relief Sought –

A clear mechanism be developed for accounting for and consenting of properties that cross zone boundaries and all references to a need to be solely within the particular zone or area be removed from the plan.

Rule 13.7.3 including Tables 13 (g), (h) & (i).

Submission – Oppose in Part.

The Rule requires the adherence to Target Loads in Table 13(g) which we have opposed in this submission, as no provision has been granted for changes to the assessment model or zone calculations.

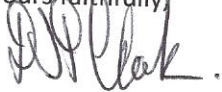
The Table (h) and (i) lays out nutrient discharge allowances for differing land use types under privately held consents and those farmers operating under a consent held by an irrigation company. These tables

set differing baseline and cutback regimes depending upon whether the discharge consent is privately and separately held, or part of a body corporate. Based on the consent recently provided to the RDR there is no consistency in the assumed "Baseline" levels deemed to be a starting point for percentage reductions over time. If it is correct that RDR have been granted a consent that effectively provides for a Baseline discharge of 81 kg/N per hectare then there is no equity or consistency in Baseline starting points or future reduction requirements. Further, reconciliation for the total discharge Baseline for the Lower Hinds Plains Hekeao area does to balance if a Discharge Baseline of 81kg N/Ha is apportioned to the Consented RDR area.

Relief Sought –

Remove all reference to, and provision for differing discharge levels for private versus scheme properties and require all Overseer modeling, auditing and allocation to be conducted under the same protocols to ensure fairness and equity across the zone.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'D Clark', with a period at the end.

David Clark.

For Valetta Farms Ltd and Valetta Holdings Ltd.