

Morag Hamilton

From: Catherine McCallum <catherine.mccallum@tp.co.nz>
Sent: Friday, 30 January 2015 3:37 p.m.
To: Mailroom Mailbox
Cc: Alanya Limmer; Pip Newland; jgraybill@fishandgame.org.nz; hfamilton@doc.govt.nz; lhume@fedfarm.org.nz; sue.ruston@fonterra.com; Cathy.begley@ngaitahu.iwi.nz; ben.o'brien@beeflambnz.com; maree.baker-galloway@andersonlloyd.co.nz
Subject: Further Submission on Variation 2 to the pLWRP by Mayfield Hinds Irrigation Ltd
Attachments: Further Submission on Variation 2 to the LWRP by Mayfield Hinds Irrigation Limited.pdf

Dear Sir/Madam

Please see **attached** for filing and by way of service the further submission regarding Variation 2 of the Land & Water Regional Plan by Mayfield Hinds Irrigation Limited.

Can you please confirm receipt of the submission. If you have any questions please contact us.

Kind regards

Catherine McCallum | Solicitor



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**FURTHER SUBMISSION ON VARIATION 2 TO THE PROPOSED CANTERBURY LAND and
WATER REGIONAL PLAN**

Clause 8 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: Mayfield Hinds Irrigation Limited

1 This further submission is on:

Variation 2 to the Proposed Canterbury Land and Water Regional Plan (**Plan**)

2 The submitter supports in part the following submissions:

2.1 Central South Island Fish & Game (Fish & Game) – more particularly that part of paragraph 29 of its submission that seeks to introduce management outcomes appropriate to the values of a particular waterbody.

for the following reasons

2.2 The Plan adopts a national bottom line¹ water quality target for spring-fed plains rivers, without first carrying out the objective setting process specified in the NPSFM. This means that variations in suitable targets for water bodies in the catchment due to their disparate values have not been recognised, and high and potentially unachievable targets have been set at the risk of significant cost to the community.

2.3 MHIL supports the Fish & Game submission only insofar as it seeks that water quality targets specific to individual waterbodies should be adopted by the Plan. High and potentially unachievable outcomes or targets should be avoided until the Environment Canterbury (ECan) progressive implementation programme pursuant to the NPSFM is carried out by ECan for the catchment. Until that is concluded, targets and limits for the Lower Hinds sub-catchment in particular, should be set at a level that assumes implementation of good management practice and 30,000ha of additional irrigation at current operating practice, with provision for 5 yearly reviews.

2.4 Department of Conservation – more particularly that part of its submission that requests new policy 13.4.21 and its general support of targeted stream augmentation (TSA) and the use of existing drains for conveyance of irrigation scheme water.

for the following reasons:

2.5 Using drains for conveyance of irrigation scheme water is a cost effective and environmentally beneficial method to provide water to new or existing irrigation

¹ National Policy Statement Freshwater Management (NPSFM)
PN-2003853-2-118-V1

scheme shareholders. The drain itself will benefit from the flow between the point of discharge and the point of abstraction. In addition, the groundwater resource will benefit from any consequential losses due to leakage between the discharge and abstraction points.

2.6 Federated Farmers of New Zealand – more particularly that part of its submission that:

- (a) requests deletion of policy 13.4.10(a) unless it is accompanied by a satisfactory definition of what a drain is in the context of the rule.
- (b) requests deletion of rule 13.5.23 or at the least, removal of the prohibited activity status from rule 13.5.23.

for the following reasons:

2.7 MHIL supports the exclusion of stock from waterbodies but wishes to ensure the changes introduced by the Plan do not inadvertently capture irrigation canals.

2.8 The prohibited activity status contained in rule 13.5.23 is potentially too costly to the members of the farming community that rely on irrigation water.

2.9 Fonterra New Zealand – more particularly that part of its submission that seeks deletion of the definition of 'Good Management Practice Nitrogen Loss Rates' and amendment to Policy 13.4.13(a) by removal of reference to Good Management Practice Nitrogen Loss Rates, instead leaving a requirement to implement good management practice.

for the following reasons:

2.10 It is not appropriate to require compliance with specific, quantified Good Management Practice rates when these do not exist yet and hence their appropriateness cannot be tested through the submission and hearing process.

3 The submitter opposes the following submissions:

3.1 Those parts of the TRONT submission that propose to introduce a more onerous planning framework than the Plan, particularly with regard to nutrient management.

3.2 The Fish & Game submission, excluding that part supported in paragraph 2.3 above.

3.3 That part of the Beef and Lamb New Zealand Ltd (**Beef & Lamb**) submission that advocates adoption of a natural capital land use capability (LUC) based nitrogen allocation model.

4 The submitter opposes the relevant parts of the submissions for TRONT, Fish & Game and Beef & Lamb for the following reasons:

4.1 The TRONT and Fish & Game submissions seek a more onerous planning framework, particularly with regard to nutrient management. The changes sought jeopardise the continued rural productivity of the sub-regional area.

4.2 An LUC nitrogen allocation model as proposed by Fish & Game and Beef & Lamb does not recognise and will penalise farmers and schemes with significant investment

in fixed infrastructure in the catchment. These farmers lack the flexibility to move operations to different soil types and are therefore at risk of significant economic cost to their operation.

- 4.3 In addition, if LUC was considered an appropriate nitrogen allocation model, it should be introduced at the wider regional scale to fully recognise variations in soil types. Introducing it at a small scale risks penalising farmers in the Hinds sub-region disproportionately to other farming operations in the region.

Dated this 30th day of January 2015



A C Limmer / P J Newland
Counsel for the Submitter

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