

## Submission on Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan

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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 Monday 25 May 2015 to:

Freepost 1201 Variation 3 to pLWRP  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: David John Linden Phone (Hm): 03 6895803  
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\* the organisation that this submission is made on behalf of  
 Postal Address: 2304 Waikato Highway Phone (Cell): 027 2987089  
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 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: 14-5-15

(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



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**Farm Background:**

- \*Fourth Generation Family Farm
- \*244 Hectares
- \*Running Sheep Cattle and Mixed Cropping
- \*Partially Irrigated (irrigation development in progress)

**Management (Mitigation activities in place)**

- \*All paddocks tree belted (mitigates wind erosion and nutrient losses through uptake of tree belts)
- \*All waterways have been fenced for many years
- \*Farm has and always will be farmed under GFM
- \*Family Farm succession relies on flexibility as younger new ideas are developed and implemented under GFM
- \*Nutrient numbers are not feasible under what is proposed

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**My submission relates to all parts of the plan that allocate a nitrogen load to for the Wainono catchment and applies it as a fixed nitrogen discharge limit to my property**

**I oppose**

- Applying nitrogen baselines as currently calculated
- The current load limit for the Wainono catchment
- Applying a nitrogen discharge limit to my property
- The allocation of nitrogen within the Wainono catchment
- Rule 15.5.2
- Rule 15.5.5
- Table 15(m)

**I seek that the Council**

- Review the load calculation
- Provide flexibility in the plan to allow for ongoing development and flexibility in farm management
- Provide for future N allocation to low emitters (below 17kgN/Ha) allowing flexibility for ongoing development
- Provide for transition times before allocation framework applies to allow for existing water consent holders to finish irrigation infrastructure development
- Insert new policy into 15.4 to provide for greater flexibility and transition times and to recognise the potential of dryland development

**Reasons for my submission**

Nitrogen Baselines (2009-2013) need to be extended to provide for greater flexibility and recognise variations in existing farm management i.e.: irrigated consents issued just prior to this date does not give consent holders time to develop nor does it recognise the impact of changes in versions of Overseer or variations in farm management during the baseline years (such as reduced irrigation during wet seasons)

Sheep, Beef and Cropping Farmers develop farms as economic farm surplus allows – this significantly impacts their baseline calculation. These properties are not high nitrogen loss properties but sustainably managed farms with a long term development plan. The current proposed variation severely restricts those farmers in their ability to realise the long term land management plan for their properties and to respond to markets

The plan unnecessarily and unfairly restricts my ability to farm in favour of allowing existing higher nitrogen loss properties to continue their activity.

Mixed farming development happens over a much longer time frame than dairy farmers who due to the structure of their industry have to be up and running fully immediately.





Specific Provision	Submission Support/Oppose	Decision Sought	Reasons for decision	
Rule 15.5.2	Oppose	Amend rule to provide for low level development of existing dryland and partly irrigated properties. Provide for realisation of existing consent. Increase number of years in calculation of baseline. Provide for more allocation to dryland properties over time.	Impacts my ability to farm Does not provide for full use of existing resource consent Impacts on my flexibility of land use Will not necessarily achieve desired objectives of water quality Actions of farmer to manage nutrients more important than focus on allocation of nitrogen Suggested amendments provide greater flexibility in farming system to allow sustainable development	
Rule 15.5.5	Oppose	Amend rule to provide for low level development of existing dryland and partly irrigated properties. Provide for realisation of existing consent. Increase number of years in calculation of baseline. Provide for more allocation to dryland properties over time.	Impacts my ability to farm Does not provide for full use of existing resource consent Impacts on my flexibility of land use Will not necessarily achieve desired objectives of water quality Actions of farmer to manage nutrients more	

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			important than focus on allocation of nitrogen Suggested amendments provide greater flexibility in farming system to allow sustainable development	
Table 15(m)	Oppose	Amend rule to provide for low level development of existing dryland and partly irrigated properties. Provide for realisation of existing consent. Increase number of years in calculation of baseline. Provide for more allocation to dryland properties over time.	Impacts my ability to farm Does not provide for full use of existing resource consent Impacts on my flexibility of land use Will not necessarily achieve desired objectives of water quality Actions of farmer to manage nutrients more important than focus on allocation of nitrogen Suggested amendments provide greater flexibility in farming system to allow sustainable development	

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