

From: [Chrissy & Keith Adams](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Proposed Variation 3 to the Proposed CLWRP -Sec 15
Date: Monday, 25 May 2015 3:49:45 p.m.
Attachments: [Adams submission variation 3.pdf](#)

Submission on Proposed Variation 3 to the Proposed Canterbury Land and Water Regional plan – Section 15 – Waitaki and South Coastal Canterbury

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

Full Names: KEITH C & CHRISTINE B ADAMS
Phone (Hm): 03 6892843
Phone (Wk): 03 689 2843
Postal Address: 28 Bridge Road, R D 7, Waimate
Phone (Cell): 0211636436 & 021 1323865
Postcode: 7977
Email: adamskc@xtra.co.nz

We are not a trade competitor for the purposes of the submission but the variation has a direct impact on our ability to farm. If changes sought in the plan are adopted they may impact on others but we are not in direct trade competition with them.

We do wish to be heard in support of this submission

SUBMISSION

Our property is family owned and has operated as a Dryland Beef Breeding and Sheep farm over the past 23 years. It is currently not irrigated but is within the "Waihao Downs Irrigation" command area at the Douglas Settlement and totals 200ha. 125ha of which is virgin Hill country and 75ha form's a basin with good soils. Currently some limited dairy grazing has taken place in the past few years with arable cropping and pig farming having taken place by the prior owner.

Management style: our property is

- Conservatively farmed producing quality stock bordering on organic.
- Limited fertilizer and chemical inputs are used
- Weather conditions – drought/flood years dictate whether additional feed supplements are purchased as required.
- Drainage – the 70 ha basin is prone to some flooding from the large "Hill country catchment area" that surrounds us and the numerous tile drain lines put in many years ago by the pioneers in the district.

Mitigation activities include:

- An ongoing waterways and paddock fencing programme has been implemented as farm income has allowed
- Reticulation stock water scheme is utilized in all paddocks/blocks
- Stock bridges at access points "across waterways and culverts" have been put in as farm income has allowed.
- Limited plantings/ornamental and native continue to be made as farm income allows

We believe the nutrient allocation in variation 3 of a maximum limit of 10 for this property is now completely unacceptable and unfairly restricts our ability to farm in the future.

- We are some of the few third generation farmers still farming on our own account. This Variation affects any future development and any future changes of farming practices. Our personal choices in farming are being taken away. One size does not fit all farms and farming types. The opportunities and choices for our children should they wish to continue to farm this property in the near future are being eroded as this will limit the ability for any of us to increase production as the present government has intimated ie: "that as a country we double production by 2025". Naturally this has to be achieved sustainably and economically both for the environment and for the many families who have consistently and independently funded and proved over past years through family succession and farming practices that this is possible with similar farming operations.

- Production increases for all farmers is also being affected by the expansion of towns, cities and lifestyle blocks onto productive land throughout New Zealand and therefore shifting some farming activities onto inappropriate land types.
- Irrigation is a wonderful way forward but is now proving to be expensive for many individual farmers to participate. As proven by the limited uptake of hectares in the "Waihao Downs Irrigation scheme" since its conception and is encouraging Corporate ownership and alliances where profits and not the environment and sustainable farming choices is a priority.

Our submission relates to all parts of the plan that allocate a nitrogen load for the Wainono catchment and applies it as a fixed nitrogen discharge limit to our properties using a flexibility cap or deriving a Nitrogen loss baseline

We 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), 15(N), 15(P)

We seek that the Council

- Review the load calculation to focus on priorities for achieving water quality outcomes
- Provide flexibility in the plan to allow for ongoing routine development and flexibility in farm management
- Provide for future N allocation to low emitters allowing flexibility for ongoing routine development
- Provide for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development
- Insert new policy into 15.4 to provide for greater flexibility and transition times and to recognise the potential of low emitter property development
- For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
- Approve modelling of Modified equal allocation for Waihao Wainono Northern Streams catchment as a way forward for the future.

Reasons for our submission

The whole process has been made to be overly complicated.

It concerns us that the facts and figures, science and models portrayed to us during the NARG meetings and used to derive the Nitrogen allocation Model in the plan have relied on outdated versions of Overseer, incorrect soil information, incorrect use of "look up table" and do not provide for changes to incorporate the matrix of good management or updated Overseer and soils data.

Nitrogen Baselines (2009-2013) need to be extended to provide for greater flexibility and recognise variations in existing farm management

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 our ability to farm

Specific Provision	Submission Support/Oppose	Decision Sought	Reasons for decision
Policies 15.4.1 – 15.4.17	Oppose	<ul style="list-style-type: none"> • Amend policies to provide for development of existing low emitting properties. • Provide for flexibility in current farming system if baseline is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to low emitting properties over time. • Immediately adopt flexibility cap to low emitting farmers up to 15kg Subject to variations in Overseer and the total load. • For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline • Time frames for achievement of max caps need to be 2025 as per NARG agreement 	<ul style="list-style-type: none"> • Impacts our current ability to farm • Impacts on our flexibility of current and future 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 • Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes • Max caps not achieved as per NARG agreement and hence impacts on low emitters flexibility.
Rule 15.5.2 – 15.5.5	Oppose	<ul style="list-style-type: none"> • Amend policies to provide for low level development of existing low emitting properties. • Provide for flexibility in current farming system if baseline is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to low emitting properties over time. • Immediately adopt flexibility cap 	<ul style="list-style-type: none"> • Impacts our current ability to farm • Impacts on our flexibility of current and future 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

		<p>to low emitting properties up to 15kg /ha Subject to variations in Overseer and total load calculations.</p> <ul style="list-style-type: none"> For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline 	<ul style="list-style-type: none"> Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes
Table 15(m) ,15(N), 15(P)	Oppose	<ul style="list-style-type: none"> Leave tables blank or defer decision on plan change and adoption of tables until catchment models have been updated to include new version of Overseer and Matrix of good management and updated soils data We have always wanted modified equal allocation of the total nutrient load and that hasn't changed. 	<ul style="list-style-type: none"> Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes Need to provide for matrix of good management updates Need to update and rerun catchment models that informed collaborative Nutrient Allocation discussions and plan change As low emitters we believe the process to be flawed and to complicated from the beginning in allocating nitrogen and has proved to be so. Modified equal allocation is the best outcome for the environment and the simplest to implement. The fundamental point of allowing those who are causing the nitrogen issues to maintain the highest leaching limits while those who have not caused an issue are constrained by their past low impact behaviour is something we find inappropriate.

Nutrient Allocation Reference Group

We acknowledge the extensive work of the Nutrient Allocation Reference Group in seeking to put forward a consensus agreement on an allocation method for the catchment. While that agreement reflects an agreed decision to try and make the best of what is generally considered a bad solution to nutrient allocation in the catchment, we are concerned that position does not reach an optimal nutrient allocation for the catchment or for optimising or incentivising the management of Nitrogen and other nutrient loss from individual properties.

We acknowledge the work of the Nutrient Allocation Reference Group – Low Emitters

We thank Environment Canterbury for the opportunity to submit on Variation 3 and we look forward to ongoing dialogue about these issues and constructively working with council.

Keith & Chrissy Adams

Submission on Proposed Variation 3 to the Proposed Canterbury Land and Water Regional plan – Section 15 – Waitaki and South Coastal Canterbury

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

Full Names: KEITH C & CHRISTINE B ADAMS
Phone (Hm): 03 6892843
Phone (Wk): 03 689 2843
Postal Address: 28 Bridge Road, R D 7, Waimate
Phone (Cell): 0211636436 & 021 1323865
Postcode: 7977
Email: adamskc@xtra.co.nz

We are not a trade competitor for the purposes of the submission but the variation has a direct impact on our ability to farm. If changes sought in the plan are adopted they may impact on others but we are not in direct trade competition with them.

We do wish to be heard in support of this submission

SUBMISSION

Our property is family owned and has operated as a Dryland Beef Breeding and Sheep farm over the past 23 years. It is currently not irrigated but is within the "Waihao Downs Irrigation" command area at the Douglas Settlement and totals 200ha. 125ha of which is virgin Hill country and 75ha form's a basin with good soils. Currently some limited dairy grazing has taken place in the past few years with arable cropping and pig farming having taken place by the prior owner.

Management style: our property is

- Conservatively farmed producing quality stock bordering on organic.
- Limited fertilizer and chemical inputs are used
- Weather conditions – drought/flood years dictate whether additional feed supplements are purchased as required.
- Drainage – the 70 ha basin is prone to some flooding from the large "Hill country catchment area" that surrounds us and the numerous tile drain lines put in many years ago by the pioneers in the district.

Mitigation activities include:

- An ongoing waterways and paddock fencing programme has been implemented as farm income has allowed
- Reticulation stock water scheme is utilized in all paddocks/blocks
- Stock bridges at access points "across waterways and culverts" have been put in as farm income has allowed.
- Limited plantings/ornamental and native continue to be made as farm income allows

We believe the nutrient allocation in variation 3 of a maximum limit of 10 for this property is now completely unacceptable and unfairly restricts our ability to farm in the future.

- We are some of the few third generation farmers still farming on our own account. This Variation affects any future development and any future changes of farming practices. Our personal choices in farming are being taken away. One size does not fit all farms and farming types. The opportunities and choices for our children should they wish to continue to farm this property in the near future are being eroded as this will limit the ability for any of us to increase production as the present government has intimated ie: "that as a country we double production by 2025". Naturally this has to be achieved sustainably and economically both for the environment and for the many families who have consistently and independently funded and proved over past years through family succession and farming practices that this is possible with similar farming operations.
- Production increases for all farmers is also being affected by the expansion of towns, cities and lifestyle blocks onto productive land throughout New Zealand and therefore shifting some farming activities onto inappropriate land types.
- Irrigation is a wonderful way forward but is now proving to be expensive for many individual farmers to participate. As proven by the limited uptake of hectares in the "Waihao Downs Irrigation scheme" since its conception and is encouraging Corporate ownership and alliances where profits and not the environment and sustainable farming choices is a priority.

Our submission relates to all parts of the plan that allocate a nitrogen load for the Wainono catchment and applies it as a fixed nitrogen discharge limit to our properties using a flexibility cap or deriving a Nitrogen loss baseline

We 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), 15(N), 15(P)

We seek that the Council

- Review the load calculation to focus on priorities for achieving water quality outcomes
- Provide flexibility in the plan to allow for ongoing routine development and flexibility in farm management
- Provide for future N allocation to low emitters allowing flexibility for ongoing routine development
- Provide for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development
- Insert new policy into 15.4 to provide for greater flexibility and transition times and to recognise the potential of low emitter property development
- For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
- Approve modelling of Modified equal allocation for Waihao Wainono Northern Streams catchment as a way forward for the future.

Reasons for our submission

The whole process has been made to be overly complicated.

It concerns us that the facts and figures, science and models portrayed to us during the NARG meetings and used to derive the Nitrogen allocation Model in the plan have relied on outdated versions of Overseer, incorrect soil information, incorrect use of “look up table” and do not provide for changes to incorporate the matrix of good management or updated Overseer and soils data.

Nitrogen Baselines (2009-2013) need to be extended to provide for greater flexibility and recognise variations in existing farm management

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 our ability to farm

Specific Provision	Submission Support/Oppose	Decision Sought	Reasons for decision
Policies 15.4.1 – 15.4.17	Oppose	<ul style="list-style-type: none"> • Amend policies to provide for development of existing low emitting properties. • Provide for flexibility in current farming system if baseline is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to low emitting properties over time. • Immediately adopt flexibility cap to low emitting farmers up to 15kg Subject to variations in Overseer and the total load. • For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline • Time frames for achievement of max caps need to be 2025 as per NARG agreement 	<ul style="list-style-type: none"> • Impacts our current ability to farm • Impacts on our flexibility of current and future 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 • Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes • Max caps not achieved as per NARG agreement and hence impacts on low emitters flexibility.
Rule 15.5.2 – 15.5.5	Oppose	<ul style="list-style-type: none"> • Amend policies to provide for low level development of existing low emitting properties. • Provide for flexibility in current farming system if baseline is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to low emitting properties over time. 	<ul style="list-style-type: none"> • Impacts our current ability to farm • Impacts on our flexibility of current and future 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

		<ul style="list-style-type: none"> • Immediately adopt flexibility cap to low emitting properties up to 15kg /ha Subject to variations in Overseer and total load calculations. • For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline 	<ul style="list-style-type: none"> • Suggested amendments provide greater flexibility in farming system to allow sustainable development • Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes
Table 15(m) ,15(N), 15(P)	Oppose	<ul style="list-style-type: none"> • Leave tables blank or defer decision on plan change and adoption of tables until catchment models have been updated to include new version of Overseer and Matrix of good management and updated soils data • We have always wanted modified equal allocation of the total nutrient load and that hasn't changed. 	<ul style="list-style-type: none"> • Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes Need to provide for matrix of good management updates Need to update and rerun catchment models that informed collaborative Nutrient Allocation discussions and plan change • As low emitters we believe the process to be flawed and to complicated from the beginning in allocating nitrogen and has proved to be so. Modified equal allocation is the best outcome for the environment and the simplest to implement. The fundamental point of allowing those who are causing the nitrogen issues to maintain the highest leaching limits while those who have not caused an issue are constrained by their past low impact behaviour is something we find inappropriate.

Nutrient Allocation Reference Group

We acknowledge the extensive work of the Nutrient Allocation Reference Group in seeking to put forward a consensus agreement on an allocation method for the catchment. While that agreement reflects an agreed decision to try and make the best of what is generally considered a bad solution to nutrient allocation in the catchment, we are concerned that position does not reach an optimal nutrient allocation for the catchment or for optimising or incentivising the management of Nitrogen and other nutrient loss from individual properties.

We acknowledge the work of the Nutrient Allocation Reference Group – Low Emitters

We thank Environment Canterbury for the opportunity to submit on Variation 3 and we look forward to ongoing dialogue about these issues and constructively working with council.

Keith & Chrissy Adams