Dear Sir/Madam

Please find attached my submission to the Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan- Section 15- waitaki and South Coastal Canterbury.

Kind Regards

David Gardner
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

FILL IN THIS OR FILL IN THE COVER SHEET ON ECAN WEBSITE

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

I do wish to be heard in support of this submission

Nutrient Allocation Reference Group

I 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, I am 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.
SUBMISSION
The property is located in Waihoarunga between 450m and 600m above sea level and has been in our family for 104 years. It is rolling hill country about 2/3 arable.

It is a Sheep and Beef farm that has been continually under development so much so that the production would be many times what it was when development started. It is 805Ha with a great many changes that can yet be made that will further increase production. Lucerne, Tall Fescue, Fodder Beet, increasing fertility are just a few of the things that are or will impact positively here.

The farm is increasingly intensive with a 65% 35% sheep cattle ratio. Prime lamb production is the main income driver. Winter feed crops are becoming more important as time goes on to help mitigate the lows in dryland farming

-As much as possible is done to keep cattle out of creeks when they are flowing.
-Silage is made at 40% dry matter to reduce leachate.
-Have a low number of heavy cattle wintered.
-only a little cultivation for fodder beet

Variation 3 is not fair for our property because it limits land use options in the future. The Nitrogen limit is 10. The sentence on Page 19 of the Variation 3 seems to be driving much of this and shows a huge lack of knowledge about what is happening in dryland farming. I quote from Page 19 “Due to a lack of in-catchment water, the area is now dependent on irrigation water for further economic development to occur”. Note that sheep are largely run on dryland properties and whilst sheep numbers nationwide have halved we still produce the same weight of lamb. We all know that the environment needs protecting and improving and while we all need to work at this the high emitters and those on light high leaching land closer to streams and rivers need to take a greater responsibility because after all this is supposed to be about the environment.

My 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 my property using a flexibility cap or deriving a Nitrogen loss baseline

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 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 dryland development
• For stable dryland 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

Reasons for my submission

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 my ability to farm

I am concerned that the science and models that have been used to derive the Nitrogen allocation model in the plan have relied on outdated versions of Overseer, incorrect soils information, incorrect use of the “look up tables” and do not provide for changes to incorporate the matrix of good management or updated Overseer and soils data.

I am also concerned that the Waihao River catchments are being tied in with Lake Wainono because earlier in this process it was considered to be separate.

The fundamental point of allowing those who are causing the N 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 I find inappropriate

A system of Equal Allocation with a strong emphasis on the MGM good practice rules seems to be a sensible way forward to me.
<table>
<thead>
<tr>
<th>Specific Provision</th>
<th>Submission Support/Oppose</th>
<th>Decision Sought</th>
<th>Reasons for decision</th>
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<tbody>
<tr>
<td>Policies 15.4.1 – 15.4.17 Oppose</td>
<td>• Amend policies to provide for low level development of existing dryland and properties with small area of irrigation as part of predominantly dryland properties. • Provide for flexibility in current farming system if benchmark is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to dryland properties over time. • Immediately adopt flexibility cap to dryland farmers up to 15kg • For stable dryland farming systems where emission exceeds 15kN/Ha extend the years over which the calculator of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline</td>
<td>• Impacts my current ability to farm • Impacts on my 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 Oversee, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes</td>
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<tr>
<td>Table 15(m)</td>
<td>Oppose</td>
<td>Leave table blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of Overseer and Matrix of good management and updated soils data</td>
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<td>• Need to provide for matrix of good management updates</td>
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<td>• Need to update and rerun catchment models that informed collaborative Nutrient Allocation discussions and plan change</td>
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