

From: [david sleigh](#)
To: [Mailroom Mailbox](#)
Subject: Submission: Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Date: Tuesday, 26 May 2015 8:06:01 a.m.
Attachments: [DS submission variation 3 \(3\) BLNZ.docx](#)

Please find my submission attached.

David Sleigh

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

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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

Background information

I run a family owned sheep and dairy support farm with my wife. The property has a total area of 300 hectares and it is located on the Waimate Hunter Road approximately 8 km from Waimate.

The sheep part of the operation consists of a breeding ewe flock and lamb finishing. The dairy support part of the operation consists of the raising of dairy young stock and the wintering of dairy cows.

Farm environment mitigation practises:

- All waterways are fenced off
- Intensively farmed livestock are excluded from waterways
- Riparian buffers to filter runoff from paddocks
- Soil testing to determine fertiliser applications
- Fertiliser applications timed to minimise nutrient leaching. Such as measuring soil temperatures prior to nitrogen fertiliser applications
- Direct drilling where possible to minimise soil erosion
- The management of stock to avoid the grazing of saturated paddocks

The proposed nutrient allocation in variation 3 will be very restrictive to me and my family's ability to derive a sustainable income from the farm.

Our farm supports three generations of my family. My wife and I have recently taken over the management of the farm and have undertaken a programme of intensification and move from sheep farming to more cattle.

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 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

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, and 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.

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 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 Subject to variations in Overseer and total load calculations. • 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 	<ul style="list-style-type: none"> • 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 Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes
Rule 15.5.2 – 15.5.5	Oppose	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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 Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes

		<ul style="list-style-type: none"> • Immediately adopt flexibility cap to dryland farmers up to 15kg, subject to variations in Overseer and total load calculations. • For stable dryland farming systems where emission exceeds 15kgN/Ha extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline 	
Table 15(m)	Oppose	<ul style="list-style-type: none"> • 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 	<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