

**From:** [Dan Studholme](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Variation 3 Submission  
**Date:** Monday, 25 May 2015 2:50:00 p.m.  
**Attachments:** [Submission Variation 3.pdf](#)

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Please find attached  
Regards  
Dan Studholme

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**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**

We are family farming enterprise with two properties totalling 750ha in the Wainono lagoon catchment. We have been farming here for over 150 years.

Both farms are in the same watershed, deep creek, which feeds into the Waimate creek. We are currently running a sheep, beef and dairy heifer grazing operation. About 10% of our effective farm area under spray irrigation with water from the MGI scheme. We have a mixture of flat, rolling and steep hill country.

We have a long term view to our farming business and we have a long term development programme to improve production, profit and environment. We have been actively protecting native bush, wetlands and waterways by fencing off and in some situations applying protection in perpetuity with QEII covenants.

We have a farm management plan and intensive recording system in place to measure all of our farm inputs and outputs through the FarmIQ programme.

We have serious concerns with variation 3 and how it may impact our ability to farm.

Of greatest concern is the method by which the numbers have been calculated for allocating and applying nitrogen limits. The accuracy of these numbers is so poor that there can be no confidence that the plan will achieve the desired outcomes.

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
- Tables 15(m), 15(N), 15 (P)

### **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 low emission 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.

There needs to be a greater focus on those who are causing the nitrogen issues.

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.

Specific Provision	Submission Support/Oppose	Decision Sought	Reasons for decision
Policies 15.4.1 . 15.4.17	Oppose	<ul style="list-style-type: none"> <li>• Amend policies to provide for low level development of existing dryland and properties with small area of irrigation as part of predominantly dryland properties.</li> <li>• Provide for flexibility in current farming system if benchmark is above flexibility cap.</li> <li>• Increase number of years in calculation of baseline.</li> <li>• Provide for more allocation to dryland properties over time.</li> <li>• Immediately adopt flexibility cap to dryland farmers up to 15kg</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Impacts my current ability to farm</li> <li>• Impacts on my flexibility of current and future land use</li> <li>• Will not necessarily achieve desired objectives of water quality</li> <li>• Actions of farmer to manage nutrients more important than focus on allocation of nitrogen</li> <li>• Suggested amendments provide greater flexibility in farming system to allow sustainable development</li> <li>• 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</li> </ul>
Rule 15.5.2 . 15.5.5	Oppose	<ul style="list-style-type: none"> <li>• Amend policies to provide for low level development of existing dryland and properties with small area of irrigation as part of predominantly dryland properties.</li> <li>• Provide for flexibility in current farming system if benchmark is above flexibility cap.</li> <li>• Increase number of years in calculation of baseline.</li> <li>• Provide for more allocation to dryland properties over time.</li> <li>• Immediately adopt flexibility cap to dryland farmers up to 15kg</li> </ul>	<ul style="list-style-type: none"> <li>• Impacts my current ability to farm</li> <li>• Impacts on my flexibility of current and future land use</li> <li>• Will not necessarily achieve desired objectives of water quality</li> <li>• Actions of farmer to manage nutrients more important than focus on allocation of nitrogen</li> <li>• Suggested amendments provide greater flexibility in farming system to allow sustainable development</li> <li>• 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</li> </ul>

		<ul style="list-style-type: none"> <li>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</li> </ul>	
Table 15(m)	Oppose	<p>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</p>	<ul style="list-style-type: none"> <li>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</li> <li>Need to provide for matrix of good management updates</li> <li>Need to update and rerun catchment models that informed collaborative Nutrient Allocation discussions and plan change</li> </ul>