

From: [JR&FG Gardner](#)
To: [Mailroom Mailbox](#)
Subject: Submission on Variation 3
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Attachments: [Submission PCLAWMRP 25th May 2015.docx](#)

Please find attached my submission on
Variation 3 of the Proposed Canterbury Land and Water Regional Plan-Section 15-
Waitaki and South Coastal Canterbury

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

John Gardner

Phone (Hm): 036892248

Phone (Wk): 0274526072

Postal Address: 800 Waihaorunga Back Road, No7RD, Waimate

Phone (Cell): 0274526072

Postcode: 7977

Email: taranui.farm@farmside.co.nz

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

I farm a sheep & beef property in partnership with my wife (Fiona)

It is an easy foothills property mainly arable between 450 metres & 600 metres, 600 Hectares In the Waihaorunga District.

The property is mainly fine sheep therefore wool and meat production are of equal importance.

The sheep are wintered on crops which is part of our development process to improved pasture production with new species(Lucerne).

Regarding our environment mitigation activities;

- **Trees- shelter belts**
- **Fenced off sensitive area**
- **Pasture species**
- **Fencing according to contour**
- **Conservation tillage**

Re: Nutrient allocation in variation 3 and its impact on this property. To begin with it is an unknown if you use the figures as they relate to total load.

We have huge ability to lift production (probably double) with a lot less cost financially and environmentally than irrigation(I believe HDI only has a 30% lift) with huge cost financially and environmentally. I believe every property has an equal right to an equal N allocation so ourselves or the next owner whether family or somebody else can lift production, I do not believe variation 3 allows for that which is a negative to us but also NZinc

My submission relates to all parts of the plan that allocate a nitrogen load for the Wainonocatchment 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) 15(n) 15(p)
- 15A

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 allowfor 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 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
- Adopt modified equal allocation for N
- To separate the Waihao-Wainono area into two areas Waihao and Wainono

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.

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 • 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 	<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 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 dryland farmers up to 15kg • For stable low emitting farming systems where emission exceeds 	<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

		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 • That modified equal allocation of the allowable total N load (which can be brought in over a time frame) 	<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 • The method used for allocation has proven not to work • It is the environment which is the loser • It keeps it simple, therefore no loop holes • It is the high emitters that are causing the problem
15A South Coastal Canterbury Area	Oppose	<ul style="list-style-type: none"> • That Waihao-Wainono Area be split into two areas 	<ul style="list-style-type: none"> • I do not believe the waihao river has a bit impact on the Lagoon • I understand that only 40% of the Waihao rivers water goes into the Lagoon • And by far the largest area it seems like we are subsidising the high admitters • All is not equal • Hold back productivity

