

Make Submission

Consultee	Mr Gert van't Klooster (64027)
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Address	Glenavy Tawai road 571 Waimate 7979
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Gert van't Klooster
Submission ID	V3pLWRP-78
Response Date	24/05/15 2:17 PM
Consultation Point	7 Mandatory Information (View)
Status	Submitted
Submission Type	Web
Version	0.1
If so	

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Address	Glenavy Tawai road 571 Waimate 7979
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Gert van't Klooster
Submission ID	V3pLWRP-19
Response Date	24/05/15 2:17 PM
Consultation Point	15.7.6 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Reason Opposed :

Oppose all nutrient management policies and rules within this plan that relate to **Section 15.7.6 Water Quality Limits and Targets** for the following reasons:

- 1 . The Overseer version has changed since notification of this plan and therefore output figures from Overseer have changing substantial with refinement of inputs to Overseer. As a result the Overseer figures set in the plan as Nitrogen caps in the relevant Tables are out of date and are not considered achievable or relevant with the latest version of Overseer.
2. It must be fully understood what the new version of Overseer does for all farming types, to determine new and appropriate Nitrogen caps for the catchment that are able to be changed with subsequent new Overseer versions

3. The Overseer Best Practice Data Input Standards 6.2 under Section 4.3 Soil Description now requires soil moisture values for each soil type but these give values for the soil type in its native state not for soils that have been modified by years of irrigation that would potentially have much higher water holding capacity and therefore reduced nutrient leaching. MGI has done a study in conjunction with the University of Otago (Boniface) what clearly supported the increase in organic matter under irrigation.
4. S-Maps soils have changed which had been used within Overseer therefore changing the outputs and Nitrogen Caps for the catchment. There are numerous concerns on the accuracy of inputs used within Overseer to determine the Nitrogen Caps that is area's and water holding capacities of the soils in the catchment.
5. There is no modelling to show what is allowable if augmentation with Waitaki water is not available into the Wainono Lagoon that would mean there is potentially no extra capacity in Nitrogen to allow the Flexi Cap and Maximum cap scenarios.
6. Some properties are located within more than one Surface Water Allocation Zone, therefore it must be clearly set out as to how this is dealt with under this policy. Is it required that Overseer must be split out for each of the Zones to show compliance with nutrient loads within each zone, if the nutrient loads are different. The scale of the maps means it is difficult to identify what properties are affected by this.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Outcome sort :

- 1 The Overseer version to determine these Nitrogen Caps must be specified clearly in the plan and Tables.
- 2 The plan needs to accommodate changing Overseer versions and therefore Nitrogen Caps must be able to be updated within a Schedule or by some other means, by a group established for this role and in agreement with ECan.

Given the concerns with Overseer, should MGM with Flexibility caps be used in the meantime until this is sorted out.
- 3 Real soil mapping and sampling should be done to compare water holding capacity of soil in situ against the figures that are used in the model Nutrient Budgets used to create the N loss load limits used in Table 15(P)
- 4 Use a G.I.S overlay over S Map to determine the specific areas of the different soils in the catchment.
- 5 Provide the alternative modelling without augmentation and what effects that has on Nitrogen allocation now and in the future.
- 6 We are seeking that if the Zones are different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone. It needs to be stipulated that the Farm Enterprise can cover more than one Zone, and if loads are different these are averaged.

Choose one of the following three

Tick relevant topics