

**From:** [Lyn Parlane](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan attached on behalf of Twizel Dairy (Dave Gordon) [DC-Documents.FID1390340]  
**Date:** Friday, 11 March 2016 12:21:18 p.m.  
**Attachments:** [20160311121825451.pdf](#)  
**Importance:** High

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## Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

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Submitter ID:

File No:

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

Return your signed submission by 5.00pm Friday 11 March 2016 to:

Freepost 1201 Plan Change 5 to LWRP  
Environment Canterbury  
P O Box 345  
Christchurch 8140

Full Name: Dave Gordon Phone (Hm): 034350403  
Organisation\*: Twizel Dairy Phone (Wk): \_\_\_\_\_  
\* the organisation that this submission is made on behalf of  
Postal Address: ct- Duncan Cotterill, PO Box 5 Phone (Cell): 0212480499  
Christchurch Postcode: 8041  
Email: dave@twizeldairy.co.nz Fax: \_\_\_\_\_  
Contact name and postal address for service of person making submission (if different from above):  
ewan.chapman@duncancotterill.com

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- ☒ I could not gain an advantage in trade competition through this submission; or  
☐ I could gain an advantage in trade competition through this submission.

**If you have ticked this box please select one of the following:**

- ☐ I am directly affected by an effect of the subject matter of the submission  
☐ I am not directly affected by an effect of the subject matter of the submission

Signature: \_\_\_\_\_ Date: 10.3.2016

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

- ☐ I do not wish to be heard in support of my submission; or  
☒ I do wish to be heard in support of my submission; and if so,  
☒ I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

(1) The specific provisions of the Proposed Plan that my submission relates to are		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>		(3) I seek the following decisions from Environment Canterbury. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
15.5.18B		Oppose	<p>Twizel Dairies is opposed to the limit of 1.6kg/ha/yr allocation limit placed on the Haldon zone for the following reasons:</p> <ul style="list-style-type: none"> <li>• The spreading of a “headroom” allocation rateably across all properties does not reflect practice. There will be undoubtedly areas that meet the thresholds for irrigation (below 900m and at a slope of &lt;25°) but will never in practice be irrigated – or developed further.</li> <li>• The allocation of headroom needs to reflect prior applications to the notification of PC5 to ensure that the headroom allocation factors in the outcome of that application</li> <li>• The allocation of headroom resource is contrary to the “first come-first served” principle of the RMA</li> <li>• Applications for headroom in the Haldon catchment need to satisfy that it meets the purpose of sustainable management under the RMA – the arbitrary allocation under this section does not meet the Act’s purpose</li> </ul>	<p>Twizel Dairies seeks a process whereby the allocation of available headroom is allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment.</p> <p>To do otherwise will lead to an overly conservative allocation model whereby all land users understand that there is available headroom but that it is “locked –up” in unusable portions of the catchment that are, because of physical and farming constraints unable to ever take up or use the allocation.</p>
Schedule 27		Oppose	Twizel Dairies opposes the unutilised portion of the Haldon Zone Load Limit on the basis that it has not factored in the allocations associated with applications currently before Ecan and awaiting processing.	<p>S 88A preserves the status of an application on a first come first served basis to apply for and be granted an allocation for a particular project.</p> <p>Twizel Dairies wants the plan changed to provide proof that the unutilised portion of</p>

				66Tonnes reflects the prior application of BIC
Consultation on PC5		Oppose	Farmers at meetings in preparation for PC 5 were informed that the “numbers were not important” This was misleading of the process and the outcome of PC 5 as notified	Consult on the specific numbers so that users of the plan have a clear understanding of their legal effect and the basis for calculation.
Good Management Practice		Oppose	<p>Farmers need practical guidelines of how GMP is to be applied in practice. It is understood that GMP was developed by industry bodies that all farms need to adhere to by a certain date Twizel Dairies has only had the opportunity to evaluate the real effect of GMP within the last three weeks .</p> <p>It's initial assessment is that while it is developed on the basis that it should have little to no effect on farmers financially it will have a demonstrative adverse effect on Twizel Dairies operations.</p> <p>Measures could include</p> <ul style="list-style-type: none"> <li>• Gmp is taking all the phosphate out of our fodder crops</li> <li>• Putting on less nitrogen</li> <li>• Cutting water use back</li> </ul> <p>It doesn't appear that GMP's factor in localised transpoevaporation rates which can have a dramatic effect on the outcomes. GMP is not developed for site specific conditions in the Omarama Basin/ Mackenzie country – yet needs to be.</p> <p>Modelled parameters for GMP analysis need to be specified in the plan or at least available to all farmers to assess prior to consultation on the plan. The parameters for our farming operations within the Benmore Irrigation Scheme need to be</p>	<p>BIC requires greater specificity of what farmers need to undertake to meet GMP requirements now. BIC does not oppose the concept of GMP's but has no basis from the plan itself as to what measures are required. Clearly this is an issue because consent processes are dependent on whether GMP is meet on a case by case basis.</p>

			<p>specified so that outcomes can be evaluated.</p> <p>It is the information that is not disclosed in the plan relating to GMP's that is of most concern to our farming operations.</p> <p>We believe we are making a significant contribution to the wellbeing of the surrounding environment through our current management practices – but those practices seem to be overlooked in the direction of the plan – by a “one size fits all” model.</p> <p>Twizel Dairies considers that this is likely to have a significant financial impact on our operations – which cannot be absorbed by farmers at this time.</p> <p>It has not been thoroughly tested. GMP is not formulated to an extent that farmers can determine whether they are compliant with the plan or not – and whether resource consents are required or not. Specific practices will be more or less appropriate to each zone Twizel Dairies traverses two zones and requires specific, tangible GMP's to be outlined in the plan or an associated document which is available at the same time as notification has occurred.</p>	
Point Source discharges: Aquaculture 15B.5.3		Oppose	<p>Aquaculture and its contribution of nutrients into surface water is a major source of contention. This is particularly the case where Aquaculture ventures are developed in close proximity to intensive farming operations. Issues of causation of a deterioration in water quality between farming and aquaculture need to be resolved in this plan</p>	<p>An approach whereby there is a direct adaptive management regime for aquaculture and a policy to manage the control of effects associated with farming activities and aquaculture where they are both active in an area adjacent to a water body – such as Kellands Pond and the Wairepo Arm.</p>

15B.4.18		Oppose in part	The plan does not seem to recognise that irrigation schemes span several zones. In BIC's case it has groundwater paths to both the Haldon and Ahuriri catchments	Correction of wording to recognise irrigations schemes that span zones
15B.5.6		Oppose in part	Twizel Dairies is a member of the Benmore Irrigation Scheme. BIC has current applications prepared in accordance with the relevant plans when submitted – these applications should proceed in accordance with the status at time of application	Amend wording to record 15B.5.6.b.ii reads An application was applied for prior to 13 February 2016