

From: [Richard Nortje](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Wednesday, 11 September 2019 11:19:26 AM

Hi

Please find attached our submission for Plan Change 7 to the LWRP

Kind Regards

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SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To the Canterbury Regional Council

ecinfo@ecan.govt.nz

Name of submitter: Rangvet Ltd (Rangiora Vet Centre)

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This is a submission on plan change 7 (PC7) to the operative Canterbury Land & Water Regional Plan (LWRP).

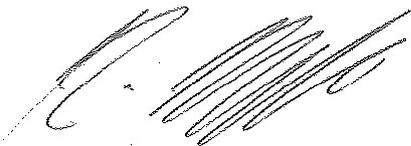
An overview of our business interests and operation, our concerns and our relief sought is set out below.

We could not gain an advantage in trade competition through this submission.

We do wish to be heard in support of the submission.

We would be prepared to present our submission in a joint case with others making a similar submission at any hearing.

Signed on behalf of owners of Rangvet Ltd (Rangiora Vet Centre)



Richard Nortje, Benjamin Ian Davidson, Samuel Geoffrey Thomas Taylor, Andrew George Bailey.

Background

Rangiora Vet Centre has been providing animal health care for all species of animals in the Waimakariri District for over 60 years. We employ approx. 70 staff from the local community, and we are an intricate part of assisting farmers to achieve optimal animal health, welfare and productivity.

We have been an intricate part of the Waimakariri community for decades. In addition to the employment opportunity we provide, we have supported a number of community projects particularly in local area schools, sports and A&P shows.

Although we have no direct involvement with the environmental aspect of farming, our services and products are helping farmers towards more sustainable practices. As an example, by improving herd fertility and reducing cow mortality, one of the indirect benefits to the environment is less animals required for target production and therefore a reduced environmental footprint. Science and technology are advancing rapidly and the level of in-depth monitoring we can provide farmers (such as data analysis and recommendation from cow-level physiological monitors) can further reduce environmental footprint by more efficient nutrition and reproductive performance.

Reasons for our submission

The aspects of Plan Change 7 that are of benefit to us

We support the overall water quality objectives being proposed as we want to see clean healthy rivers in our district. We have asked for extensive feedback from our farming clients and they are all in agreement to accept farming to GMP and also achieving 15% reductions for dairy and 5% for other land uses by 2030. Farmers need to remain viable if they are to achieve the community's water quality outcomes.

Concerns around the proposals in Plan Change 7

- We are very concerned for our dairy farming clients' futures and flow on economic affect to the agriculture service industry.
- We are very concerned about the economic and social impact on the district from the Plan Change that will severely affect land values, viability of farms and mental health of farmers.
- Farming in the district needs to remain viable in order to for farmers continue to able to make the necessary infrastructure and technology investments that can improve environmental outcomes.
- A lack of in-depth economic research into the effect of the proposed plan change. Agriculture is a major contributor to the economic prosperity of the Waimakariri District. This includes significant contribution to direct employment, service industries and the New Zealand economy.
- The proposed Nitrogen loss reductions are based on a groundwater model that has a high level of uncertainty and should not be relied upon for plan changes. We accept that water quality improvements need to occur, but there is much uncertainty around the science used to set the nitrate reductions due to a lack of data - this significantly impacts confidence in the modelling outcomes (backed up by Aqualinc analysis for DairyNZ and also analysis PDP has undertaken for WIL. Due to this there are also significant concerns with the measured versus modelled data – some areas correlate well but for a number of others they appear to be an order of magnitude out.

- Both the nitrate sub-zones and long-term nitrate reductions are therefore not based on robust science. Given this, the plan needs to place significant emphasis on undertaking a comprehensive zone monitoring programme for the next 10-years to ensure the science is well-informed in future plan changes - the farmers, WIL and the primary sectors are all committed to this.
- The proposed Nitrogen loss reductions in Table 8-9 beyond 2030 are potentially unachievable.
- Dairy farms in the Nitrate Priority Area are being unfairly targeted with long-term Nitrate loss reductions when there are many dairy farms around Carleton, Starvation Hill, Rangiora and Ohoka that are in the run-off priority area that only need to meet GMP. These catchments include a lot of swamp land that has been drained that feeds into drains and tributaries of water bodies in Nitrate Priority Area (NPA) such as Cust River, Cust Main Drain and Eyre River. Farming activities, nutrient run-off and leaching in these catchments will be affecting ground and surface water quality outcomes downstream in the NPA.
- We are supportive of catchment interventions such as Managed Aquifer Recharge and Targeted Stream Augmentation to help meet the water quality targets

We understand that Waimakariri Irrigation Limited and the Next Generation Farmers Trust have put forward an alternative Plan Change 7 framework. We fully support both their submissions and the outcomes sought.

Section #	Provision	Support / oppose	Reasons	Relief sought
4	4.99	Support	Managed Aquifer Recharge can improve groundwater quality outcomes while allowing farming industry in the district to continue.	
8	8.4.19	Support	Enabling targeted stream augmentation will ensure minimum flows during dry periods are maintained and improve water quality.	
8	8.4.23	Oppose	Groundwater resources provides reliability and back up for when irrigation scheme water is on restrictions. Efficient allocation of groundwater water resources may free up surface water for MAR and TSA.	Delete
8	8.4.25	Oppose	Proposed Long term reductions are potentially unachievable. The starting point for reductions of baseline GMP in Farm Portal is unclear and not yet defined. Proposed Nitrate Priority Area & Sub Areas will likely put some farms out of business.	Catchment wide approach for all farms in Waimakariri district. 15% reduction for Dairy and 5% for all other below GMP by 2030. Remove long term reductions. Delete Table 8-9 Delete Nitrate Priority Area and sub-areas and Run-off priority Area from planning maps. Focus on practical solutions and environmental outcomes through farm environment plan process. Facilitate localised catchment management to improve water quality and biodiversity (e.g. improved riverbed and drain

				management to replace gorse, broom and willows with indigenous species)
8	8.5.24 – 8.5.25	Oppose	<p>Proposal is unpractical and unfair as it restricts land use options for low nitrate emission farms.</p> <ul style="list-style-type: none"> - Farmers need to feed stock over winter because limited grass growth. - Will encourage more productive land in the district to be subdivided into lifestyle blocks. - Increases compliance costs for smaller already uneconomic size farms. 	<p>Amend permitted activity winter grazing thresholds to:</p> <ol style="list-style-type: none"> a. 10ha for any property less than 100ha. b. 10% of area of property for 100-1,000ha c. 100ha for any property > 1,000ha
8	8.4.35	Support	<p>Improve data gaps and lack of long-term hard data on water quality in district.</p> <p>Ensures there will be less reliance on uncertain groundwater modelling outcomes for future Plan Changes.</p>	
8	8.4.36	Oppose	<p>Common expiry date of July 2037 on all key farming resource consent will create a bottle neck for farmers to get the compliance work done by consultants and for ECAN in processing consents. This will also likely increase cost for farmers (law of supply and demand).</p> <p>Increases regulatory risk for farmers not being able to diversify expiry dates.</p>	Allow up to 15 year consent duration.
8	8.7.1	Support	Increase in minimum flows in Cust River is appropriate.	