

**From:** [Marty & Jo Ashby](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP submission  
**Date:** Wednesday, 11 September 2019 1:08:29 PM

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Please find attached our submission.

Regards

Marty Ashby

## Submission on Proposed Plan Change 7 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 5 of Schedule 1 of the Resource Management Act 1991**

**Return your signed submission by 5.00pm Friday 13 September 2019 to:**

Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
P O Box 345  
Christchurch 8140

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**Organisation\*:** ALKINGTON LTD **Phone (Wk):** \_\_\_\_\_  
\* the organisation that this submission is made on behalf of  
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**Contact name and postal address for service of person making submission (if different from above):**  
MARTY ASHBY

### 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:** [Signature] **Date:** 11/9/19.  
(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 my submission in a joint case with others making a similar submission at any hearing

## **SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN**

### **Overview of interests and farming operation**

We own a 182 ha irrigated dairy farm, and lease an adjacent 145 ha dryland support block on Mairaki Road, Fernside.

The operation is located within the Waimakariri Sub Regional Chapter Boundary but NOT within any proposed Nitrate Priority Sub Area.

The dairy block is 166 ha irrigated using water from the Waimakariri River delivered by Waimakariri Irrigation Ltd (WIL).

Irrigation to the property is via 141 ha under 5 Centre Pivot irrigators and 25 ha under a series of long lateral sprinklers.

As per WIL requirements, we already adhere to WIL's Nutrient Management Policy and Environmental practices, maintain a Farm Environment Plan and have consistently received a B audit grade since FEP inception.

Since conversion in 1999, the property was irrigated entirely by long lateral sprinklers. However in 2016, in an attempt to utilize water more efficiently, approximately \$850,000 was spent on developing the property to pivot irrigation. In addition, over the last 2 years a further \$150,000 has been spent on improving effluent storage, delivery and application, and technology around soil moisture and temperature monitoring, water flow and usage data, and nitrogen and other fertilizer applications.

We live in an area which is characterized by small block and lifestyle farm developments in recent years, due to the area's proximity to Rangiora and Christchurch. As such we are acutely aware of our obligations to operate in a sustainable manner and in a way that allows our non farming neighbours to enjoy their rural living lifestyle while maintaining a profitable dairy farming business.

We would like to be able to pass on our business to future generations in an environmentally sustainable condition that continues to be profitable for both the operators and the District.



## Reasons for our submission

We are concerned about the following areas of the Proposed Plan Change 7:

### 1. Starting Point

As a WIL shareholder we are concerned that the starting point as detailed in Table 8-9 is the Baseline GMP loss rate for the relevant farming activity i.e. 2009-2013 nitrogen baseline. We contend that the starting point must be the baseline of WIL's existing consent which is known as the MRB methodology. This methodology has been used to assess WIL's Scheme load to date and has formed the basis of the starting point for WIL shareholders who have already begun investing in nitrate reduction solutions. Any other starting point would not take into account the efforts already undertaken by WIL shareholders to date.

### 2. Modelling

We are concerned that the modelling being used to develop the proposed reductions is hugely uncertain. We accept that in the absence of appropriate levels of hard data, modelling is required to predict the effects of farming practices on waterways. However, robust evidence and water quality monitoring data is needed to show the effects of any changes. There needs to be a link between the proposed reductions and their effect on actual outcomes. The process should be as follows:

- Acknowledge that there is a water quality issue
- Reduce N leaching as per the initial model to say GMP -15%
- Apply any other Catchment interventions (MAR/TSA – discussed below)
- Measure the effect of the changes before deciding on the next course of action

Given the above, proposed significant reductions after 2030 should not be undertaken until the extent of the actions already taken have been measured.

In short: CHANGE – MEASURE - CHANGE

### 3. Catchment Interventions

As with other areas (e.g Lower Hinds/Hekeao Plains), water quality improvement should be achieved through Catchment wide solutions. This should include not only on-farm reductions but also utilize tools such as Managed Aquifer Recharge and Targeted Stream Augmentation to ensure environmental outcomes are achieved.

### 4. Economic Impact

We are concerned with the natural economic injustice of making significant changes to farming practices that impose huge costs on a significant number of people without any actual proven effects on water quality following the changes.

Our business employs a large number of contractors in its operation: cultivation, baling, silage, engineering, seed, fertilizer spreading etc etc. Should these changes go as per planned, these service businesses will be suffer huge adverse effects, with their profitability being severely affected.

## **Summary**

- As farmers we are prepared to make changes to help improve water quality, and have been doing so for the past 3 years.
- Changes must be realistically achievable.
- The effect of changes should be measured and future changes made following assessment of actual water quality data.
- MAR and TSA and other Catchment wide tools need to be part of a solution.
- Farming needs to remain profitable in order to achieve a community solution.
- Future generations must have a realistic chance at a profitable and sustainable career in farming in the Waimakariri District.
- We understand that Waimakariri Irrigation Ltd has put forward an alternative Plan Change 7 framework. We fully support their submission and the outcomes sought.