

**From:** [Robert | Orari Gorge Station](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Thursday, 12 September 2019 8:53:32 PM  
**Attachments:** [Scan1.PDF](#)

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Please find attached my submission on the Plan change 7 to the LWRP.

Regards, Robert.

Robert & Alex Peacock  
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Home of Orari Gorge Herefords, Romneys, RomTex and Terminals.

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## Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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 by:**

- Email: [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz) (subject heading: Plan Change 7 to the LWRP Submission)
- Post: Proposed Plan Change 7 to the Land and Water Regional Plan  
Environment Canterbury  
PO Box 345  
Christchurch 8140

**Organisation:** Orari Gorge Station

**Phone hm and wk:** 03 6922893

**Email:** [robert@orarigorge.co.nz](mailto:robert@orarigorge.co.nz)

**Contact name and postal address for service of person making submission** (if different from above):

Robert Peacock, Orari Gorge Station, 1021 Tripp Settlement Road, RD21, Geraldine 7991

### 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:

- adversely affects the environment; and
- 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

Signature:  Date: 11 September 2019

(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 this submission in a joint case with others making a similar submission at any hearing

**Notes.** We found the PC7 document more suited to planners and policy makers rather than those that are directly affected by them. Some of the farmers in our community chose to not to be involved in this process as they found reading and understanding the implications of and proposed changes from the plan and making a submission too difficult and confusing.

<b>(1) The specific provisions of the Proposed Plan that my submission relates to are:</b>	<b>Livestock exclusion from waterbodies (OTOP Zone), Section 14, pages 134 – 135, provision 14.4.15</b>
<b>(2) My submission is that:</b> <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>	<p><b>Oppose or Amend</b></p> <p>Needs clarification about “intermittently flowing springs (Waipuna) and artificial watercourses with surface water in them...”</p> <p>In our experience some springs in the Woodbury area result from flooding/significant rainfall events. These seepages can be widespread and may occur 1 in every 5-10 years (or less). These transient or ephemeral springs should not be required to comply with the livestock exclusion provisions. While these springs are running (usually for short periods of days or weeks), stock are generally excluded from these pastures as the ground conditions are such that stock would adversely affect soil structure and pasture/crop; this mitigates additional sediment transfer (apart from what would already be flowing in these extreme conditions). These springs or seepages may occur over multiple spots in an area with the flow and locations altering with hydrogeological conditions/increasing/decreasing recharge due to rainfall. These lower magnitude springs would be difficult to identify and fence off.</p> <p>Clarification required around artificial drains with surface water in them, as above, some drains flow intermittently and would only have surface water in them during rainfall events. For parts of the year and once the water has subsided, they operate as grassy swales that stock may graze as they are filled with grass. We would like ephemeral drains (those that have grasses/vegetated beds) excluded from the above provision.</p>
<b>(3) I seek the following decisions from Environment Canterbury:</b> <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand)</i>	<p>Clarification required around what this would entail as fencing off ephemeral or lower magnitude springs and drains would incur, in some cases, significant loss of grazing land, and/or prohibitive costs and/or would not achieve good water quality results (when compared to focusing on gullies and waterways on farm that do carry water). Exclude ephemeral and transient lower magnitude springs and drains from the above provision.</p> <p>Recognition that livestock exclusion from ephemeral springs and artificial waterways/drains on non-intensive farms may not always be needed to achieve good water quality. Alternative management practices exist and are used by deer farmers.</p>



<b>(1) The specific provisions of the Proposed Plan that my submission relates to are:</b>	<b>Nutrient management (OTOP Zone),</b> Section 14, page 135, provision 14.4.17 and page 150, provision 14.5.17
<b>(2) My submission is that:</b> <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>	<p><b>Oppose</b></p> <p>It seems illogical to allow someone with a 200 ha farm and another with 800 ha to have the same feed area (20ha). The 20ha does not take into account the size of the farm and the animals requiring feeding.</p> <p>We prefer parity in terms of proportional area for farmers with regard to feeding their animals. The 10% area rule was recently introduced and is already in place and it seems fairer to us and more consistent to continue to apply this rule across the zone. Farmers manage their winter feed areas to efficiently utilize feed and reduce runoff regardless of whether the winter feed area is 10 ha or 40ha. The 20ha seems an arbitrary figure that has been selected as a trigger for risk.</p> <p>There is no recognition that deer and cattle management practices on winter feed are often very different. By nature, deer are browsers (not grazers, like cattle) and are lighter footed. The above provision does not take into account that deer farmers are often managing their winter feed by budgeting the winter crop over longer periods and larger areas rather than intensive daily break feeding. Deer are easier to stand off when conditions are not suitable as they are not likely to be affected by acidosis (therefore not at risk from overeating or gorging when re-introduced to the crop, such as cattle). The above provision that includes deer along with cattle and restricts the feed area to 20ha seems to put cattle and deer grazing of winter feed at the same risk level.</p> <p>As farmers, we already take sediment loss as something that adversely us, and our soils and ability to grow quality feed. Our group currently mitigates sediment runoff/losses by management of the winter feed paddocks using practices such as strip tillage, grass headlands, run-offs, paddock selection and the appropriate riparian strips/fencing.</p>
<b>(3) I seek the following decisions from Environment Canterbury:</b> <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand)</i>	<p>Reword provision to include cattle and deer within the High Runoff Risk Phosphorus Zone (HRRPZ) but retain the current area (10%) allowances.</p> <p>Recognition that some winter feeding practices are of lower risk than very intensive grazing of cattle.</p>

<p><b>(1) The specific provisions of the Proposed Plan that my submission relates to are:</b></p>	<p><b>Nutrient management (OTOP Zone),</b> Section 14, page 135, provision 14.4.17 and page 150, provision 14.5.17</p>
<p><b>(2) My submission is that:</b>  <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i></p>	<p><b>Oppose</b></p> <p>Concern with regards to wording "For any property greater than 20 hectares in area that has part of the property located within the High Runoff Risk Phosphorus Zone, the area used for winter grazing of cattle or deer does not exceed 20 hectares".</p> <p>For example, the application of that rule would mean that one of the farmers in our group, who has ~1 ha within the highlighted HRRPZ would need to include the entire 400 ha property as within the zone; regardless of soil type, topography and/or associated risk. We are hoping that the HRRPZ was judiciously applied and was based on some ground proofing of soil type, topography and risk. The highlighted zone should be the actual zone or clearer outlines should be made based on applicable risk; not that any part of a property is within the zone.</p>
<p><b>(3) I seek the following decisions from Environment Canterbury:</b> <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand)</i></p>	<p>Amend wording or revise provision to allow for actual zone and risk. Remove provision that 'any part of property' would include the entire farm.</p>



<b>(1) The specific provisions of the Proposed Plan that my submission relates to are:</b>	Offal and Farm Rubbish Pits (region wide), Section 5, page 26, provision 5.24
<b>(2) My submission is that:</b> <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</i>	<p><b>Oppose</b></p> <p>The definition of "highest groundwater level" is: <i>the single highest elevation to which groundwater has historically risen that can be reasonably inferred for the site, based on all available hydrogeological and topographic information.</i></p> <p>Access of technical (hydrogeological) information on the "highest groundwater level" will be a problem for many farms. There may be times when the soil water holding capacity is such that the water table, for a short period of time, may be considered as at the surface (ie. flood events and very prolonged and repeated rainfall events). The "seasonal high water table" is much more applicable and appropriate.</p> <p>Existing offal and rubbish pits may be affected by this new level. These pits were located in good faith in accordance with the current regulations which can be frustrating when the rules are changing (and quite rapidly). There should be a shoulder period where these pits may be filled and finished. If the highest groundwater level will affect these pits, will these be required to be dug out and relocated?</p>
<b>(3) I seek the following decisions from Environment Canterbury:</b> <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand)</i>	<p>Have the seasonal high water table as the base line for the 3m allowance.</p> <p>Allow current pits to be filled and finished before requiring new pits to be established in accordance with newer rules.</p>

Add further pages as required.