

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: eandrjohnston@xtra.co.nz
Subject: Plan Change 7 to the LWRP Submission - Robert Johnston on behalf of Ashley Gorge Farming Ltd
Date: Friday, 13 September 2019 9:51:50 AM

Dear Sir/Madam

Please find attached a Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan in respect of our client Robert Johnston on behalf of Ashley Gorge Farming Ltd.

Regards

Grant Edmundson

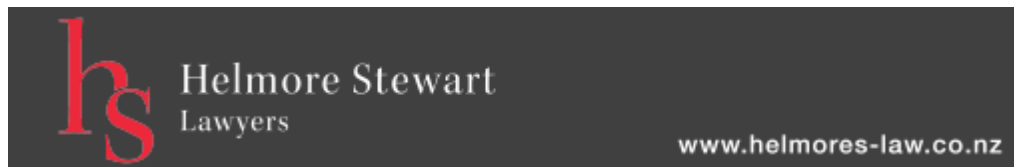
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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No:

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
PO Box 345
Christchurch 8140

Full Name: ROBERT JOHNSTON

Phone (Hm):

Organisation*: Ashley Gorge Farming Company

* the organisation that this submission is made on behalf of

Phone (Wk):

Postal Address: ~~110~~ Ashley Gorge Road, Oxford

Phone (Cell): 027 283 7279

519

Postcode: 7495

Email: eandriohnston@xtra.co.nz

Fax: N/A

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

SIS JOHNSTON, 476 Ashley Gorge Rd Oxford 7495

Trade Competition

Email info @ thegorgefarming.co.nz

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 plant 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 completion 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:

Robert Johnston

Date:

12/09/2019

(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 address 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 other making a similar submission at any hearing

with my daughter SIS Johnston
see above.

Schedule 1

Submission in regards to Plan Change 7 to the Canterbury Land and Water Regional Plan

This submission has been prepared and is submitted by me, Robert Johnstone on behalf of Ashley Gorge Farming Company in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am a Director of the Company and I am duly authorised to make this submission.

1. **Address:** 479 Ashley Gorge Road, Oxford, Waimakariri District, Canterbury
- Land Size: 1,673 hectares
- Land Use: Mixed (sheep, cattle, dairy support, small seeds and grain crops, together with hay, silage and winter brassicas). Deer were farmed on a small portion but this has been discontinued.
- Irrigation: The property is all dry land with no irrigation with extensive shelter belt systems still in place.

Reasons for Submission

- A. Our family has been farming the Ashley Gorge Station since 1922 and we have close ties to the land and the community in which we operate.
- B. The property in our family has a strong emphasis on the environment with 250 hectares of the property planted in indigenous beech forest and an additional 250 covered in manuka, and kanuka and coprosma scrub. There are two QE ii Open Space Covenants on the property, one protecting silver tussock values on the Gorge Hill and the 2nd being of indigenous Black Beech forest with a buffer of kanuka / manuka. These were offered and covenanted in 1983 by myself. There are several wetlands on the property, the largest within Gorge Hill tussock covenant area, another of flax at the Middle Bridge and several gullies of flax facing the flats from which cattle have been excluded for 5 decades. These are included in the Waimakariri District Council protected indigenous site areas. Our family are very proud of the record of conservation and protection of significant natural areas and sites on the property as well as the shelter.

Submission

1. **Submission 1 – Rule 8.5.24
SUPPORT**

- 1.1. We support the 10% threshold for winter grazing in the Waimakariri District and strongly oppose the 5% threshold. For this property, greater than 1,000 hectares, it means we could grow up to 100 hectares of winter brassica without a consent, something the property has been doing for 50 years without any detrimental environmental effects.

2. **Submission 2 – Policy 8.4.35
SUPPORT**

- 2.1. We support the measurement science of the nitrate diffusion on property rather than the predicted model.



3. **Submission 3 – Waimakariri Section 8 including definitions of Nitrate Priority Sub-Area and Planning Maps**

OPPOSE

- 3.1. The maps depicting the nitrate priority sub-areas are difficult to interpret. A majority of our flats are zoned E. This encompasses stages of reduction spreading over 60 years. Our property would be required to reduce its nitrate loss by 30% over that time and by 5% by 2030. There is a small area shown as zone A. Historically, parts of the property were zoned red and orange. The accuracy of these zones were challenged and ECan agreed with my contention. I am unable to fathom why this has changed. I respectfully submit the map is inaccurate and not a fair or true reflection of the facts. 97.5% of our property is in the Ashley catchment. This is indisputable and agreed by ECan. Our property will be severely and adversely impacted by what I interpret by these strategies with limitations on our productive capacity. I am unable to fathom how the Plan can extrapolate the progress out 60 years with any credibility when another review is planned in 10 years' time. I believe this is difficult considering the expected advancement of science over the next 10 years.
- 3.2. We seek the following relief: we wish for the maps to be corrected and our property adequately zoned and for one nitrate zone to encompass the Waimakariri District.

4. **Submission 4 – Rule 8.4.35**
SUPPORT

The Plan monitoring a review is critical to ensure the management of land and to ensure that it is efficient for purpose however we oppose the use of Overseer.

- 4.1. *Overseer:* Overseer has an acknowledged variability of + or -30%. This is a real concern. For regulatory purposes, good farmers with good practice will be criminalised through a flawed computer model.
- 4.2. Our property has had numerous Overseer assessments over time and we have seen a 27% variation between versions of Overseer. We have low N loss, yet we are captured by these future restrictions and limitations. There are other alternative measurement systems in use in Europe today which are far more accurate. We seek relief by way of a replacement measuring system.

5. **Submission 5**

- 5.1. *Consultation:* there is a legal requirement for any Council to undertake a comprehensive consultation process when introducing plans or plan changes. It is my contention that the consultation process was inadequate so far as the Plan and the Waimakariri Zone is concerned, particularly in light of the severe ramification components of the Plan. To my knowledge, there were only 3 public meetings held. I was in attendance to 1 in Oxford where it was more in the form of a presentation of what was being thought about with little opportunity for attendees to really challenge the thinking or the proposals. We were invited to write notes and pin them in displays with assurances they would be taken fully into account. As events have transpired, this has not been reflected in the plan changes. The Council have established a Zone Committee. I am of the belief this distances the Council one stage further from the community and importantly, accountability. There is an unintended consequence. I believe in a local structure with local people focusing on local issues and finding local solutions. Sadly, the intended collaborative, co-operative community driven environment is more imaginary than real and the Plan reflects this.



6. **Submission 6 – Policy 8.4.25 to 8.4.29 and Rules 8.5.21 to 8.5.29 (Table 8-9)**
OPPOSE

- 6.1. With an unclear starting baseline GMP it is difficult to determine the 15% reductions as per Table 8-9. We believe the reductions in the Table 8-9 after 1 January 2030 should be deleted and instead work as a community towards an overall ground water nitrate nitrogen concentration.

Concluding Remarks

- A. Our family has worked alongside the Department of Conservation and the Waimakariri District Council in the early 2000's to create an approximately 240 hectare bush corridor through the middle of our hill country. In addition to this, there are areas of original wetland flax which are protected from cattle. As a family, we very much see ourselves as good caretakers of this land and have done what we consider to be a very good job for nearly 100 years under the guidance of DOC and the Waimakariri District Council. This work was completed voluntarily. We do not feel there is a need for rigid enforcements.

Thank you for considering this submission.

R. H. J.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)		(3) I seek the following decisions from Environment Canterbury: (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)
Section & Page Number	Sub-section / Point	Oppose / support (in part or full)	Reasons	
	Rule 8.5.24	Support (in part)	Support 10% threshold for winter grazing and strongly oppose 5% threshold.	Amend accordingly.
	Policy 8.4.35	Support	Support the measurement of science of the nitrate diffusion of property rather than the predicted model.	
Waimakariri Section 8		Oppose		
	Rule 8.4.35	Support		
	Policy 8.4.25 to 8.4.29 Rules 8.5.21 to 8.5.29 (Table 8-9)	Oppose	With unclear starting baseline GMP is difficult to determine 15% reductions as per table 8-9.Reductions in Table 8-9 after 1.1.30 should be deleted and instead work as community towards an overall ground water nitrate nitrogen concentration.	Delete nitrate reductions beyond 1 January 2030.

Add further pages as required - please initial any additional pages

R. M. D.