

From: [John Larsen](#)
To: [Customer Services](#); [Mailroom Mailbox](#)
Cc: [Operations](#)
Subject: Plan Change 7
Date: Saturday, 14 September 2019 4:03:25 PM

Hello

Please see attached submission on Plan Change 7 – 3pages (2 attachments)

Kind regards,

John Larsen –Farm Manager

scottvilleFARM

EXCELLENCE IN AGRIBUSINESS

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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 to:

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

Full Name: John Larsen Phone (Hm): 03 313 6496
 Organisation*: Scottville Farm Phone (Wk): 03 312 6708
* the organisation that this submission is made on behalf of
 Postal Address: 55 Buckleys Rd, Rangiora Phone (Cell): 021 228 5002
 Email: john@scottvillefarm.co.nz Postcode: 7400
 Fax: 03 312 0249
 Contact name and postal address for service of person making submission (if different from above):

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: 13-9-19
(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

Overview of interests and farming operation

I am a fourth generation farmer from North Canterbury and now with my two sons, Rick and Jim, operate a 650 hectare arable/lamb fattening farm in the Swannanoa district.

With the proposed plan change 7, our farm is largely located in the proposed Sub-Area E of the nitrate priority area.

90% of this land is irrigated using both consented bore water and water from the Waimakariri Irrigation (WIL) scheme. We have a combination of centre pivot and lateral boom irrigation. We have been monitoring soil moisture (using Hydro Services) and temperatures since the early 2000's to ensure our irrigation operation runs efficiently.

This year we have achieved an A grade for our Farm Environment audit. Ensuring our farming operation remains environmentally sustainable is a top priority. We also believe it is important that farming in the Waimakariri District remains profitable to ensure that wider environmental initiatives can be continued and the **well-being** of the local community is maintained.

It is our goal to protect the environment and ensure the land remains viable for future generations and we want to be in a position to eventually hand over the farm to our children in a sustainable way.

Reasons for my submission

Our operation directly supports 7 families, numerous individuals with work, provides substantial charity plus indirectly supports many industries in Canterbury, and as a whole, positively affects the **well-being** of many people in NZ; substantially more than any negative affect that possible nitrates in water may or may not have had on the health of any individual person.

We are VERY concerned that Plan Change 7 does not take into account the level of investment that is required BY FARMERS to achieve the proposed changes and the downstream effect on the **well-being** of the local community and the whole of NZ.

The definition of the positive word **well-being** is a state characterized by health, happiness, and prosperity. The mental health of farmers going forward is of very great concern from the effect of the proposed plan change, as well as the long term effect on the local community and country as a whole.

As it stands, the proposed reductions will have a devastating impact on our farm and its future. We will have to substantially reduce our profitability to be able to meet even the proposed 2030 targets.

This means laying off staff, reducing investment in on-farm technology (THAT WE ARE ADAPTING TO REDUCE ENVIROMENTAL IMPACTS!), and more generally being unable to assist in any wider catchment initiatives that may be available to improve wider environmental positive outcomes.

We are very concerned that the modelling being relied upon is highly uncertain and does not take into account the role of future technology and other environmental mitigation. It is simply too hard to predict what the actual long-term reductions (especially beyond 2030) should be.

Also basing the reductions off baseline GMP 2009 to 2013 is totally ruthless and unrealistic. As the calculations from then to now show, the calculated nitrate losses are completely different from today's modelling. So how can you base reductions off figures that are totally inaccurate in the first place???

IT IS UTTER DESPECIABLE FOLLY TO CREATE A 70 YEAR PLAN BASED ON UNREALIABLE, UNPROVEN THEORYS AND ASSUMPTIONS. WE NEED PLANS BASED ON REAL FACTS AND PROVEN SCIENCE WITH STATE OF THE ART TECHNOLOGY.

As farmers, we are prepared to make changes for the benefit of the wider community. There is not one farmer who wants to see, or be responsible for, increased nitrate levels in drinking water. However, the changes must be realistic, practical and sustainable, based on accurate data to *encourage* achievement.

Farming must remain profitable for change to occur, otherwise we will just be farming houses or have to live in pre 19th century conditions. Agriculture is currently responsible for over half of NZ's exports. Scripture quote: *Ecclesiastes 5 verse 9 – Moreover the profit of the earth is for all: the king himself is served by the field.*

I ask Environment Canterbury, would they like the Canterbury plains to return to a potential non-productive dust bowl with a massive fire risk as it has been previously and which many areas of Australia are currently experiencing?

Section of Plan Change 7	Comments	Support/Oppose
<p>Policy 8.4.25 - 8.4.29 Rules 8.5.21 – 8.5.29 Table 8-9 (Nutrient Management Provisions)</p>	<p>The starting point for reductions is unclear. Baseline GMP Loss Rate in itself may require significant reductions over my existing farming operation.</p> <p>The reductions set out in Table 8-9 are not achievable and will have severe implications for farming. The focus of Table 8-9 on requiring reductions on farming alone is also not consistent with the wider community all working towards maintaining or improving water quality.</p>	<p>Oppose</p> <p>Ensure the provisions and reduction regime takes into account the significant reductions that may be required even to reach Baseline GMP Loss Rate (or alternatively, delete the references to “Baseline GMP Loss Rate” and replace with “Good Management Practice”).</p> <p>Delete the requirement for reductions in Table 8-9 after 1 January 2030 (or 1 January 2040 if it can be demonstrated as a part of any hearing process that the extent of reductions required is achievable and reasonable). Table 8-9 should also not differentiate between areas.</p> <p>Include a new policy that (consistent with Hinds Plains) anticipates the community working towards an overall groundwater nitrate-nitrogen concentration of 6.9 mg/L.</p>
<p>Waimakariri section 8 including definitions of <i>Nitrate Priority Sub area</i> and planning maps</p>	<p>Consistent with the changes sought in respect of Table 8-9, the planning maps and wider section 8 should not differentiate between areas. For the life of this plan any reductions should be applied equally.</p>	<p>Oppose</p> <p>Delete sub-Areas from Section 8 and associated planning maps</p>
<p>Policies 8.4.19 - 8.4.21 Rules 8.5.18 – 8.5.20 (Targeted Stream Augmentation)</p>	<p>Enabling Target Stream Augmentation is an essential part of ensuring environmental outcomes are met (and allowing farming to continue).</p>	<p>Support</p>
<p>Policies 4.99 – 4.100 Rules 5.191 – 5.193 (+ Schedule 32) (Managed Aquifer recharge)</p>	<p>Enabling Managed Aquifer Recharge is an essential part of ensuring environmental outcomes are met (and allowing farming to continue).</p>	<p>Support</p>
<p>Policy 8.4.35 (Monitoring and Review)</p>	<p>Future monitoring to inform more robust decision making processes in the future is essential.</p>	<p>Support</p>

