

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

By **Morrison, I**

Submitter Identification number: **PC7-492**

Wishes to be heard: **Yes**

Would consider making a joint submission at the hearing: **Yes**

Submitted on: **26/08/2019**

This submission was submitted via Environment Canterbury's online submission portal. The Submissions portal generates pdf files of submissions (as attached). However, some of the information that appears in the pdf files is not consistent with information the submitter entered into the portal, specifically, where submitters have ticked:

- "I wish to be heard in support of my submission" ; and
- "If others make a similar submission I will consider presenting a joint case with them at a hearing".

Additionally, the submissions portal has generated submitter and submission point numbers that are not consistent with the numbering applied in the Summary of Decisions Requested. Submission points in the Summary of Decisions Requested (SODR) are numbered using the following format:

PC7 – Submitter ID #.Submission point #

The correct submitter identification number and submitter information is specified above. This will be the number referred to in the SODR.

Proposed Plan Change 7 to the Land and Water Regional Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando
Date received 26/08/2019 5:38:17 PM
Submission #10

Address for service:

Morrison Ian / 10
353 Brockley Road Fairview Timaru 7974
Phone: 036861918
Email: i.a.morrison@farmside.co.nz
Wishes to be heard? No
Is willing to present a joint case? No

Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).

- Could you gain an advantage in trade competition in making this submission?
- No
- Are you directly affected by an effect of the subject matter of the submission that
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition
- No

Submission points

Point 10.1

Submission

I strongly appose 14.5.17 point 7 There is no evidence to back up the High Runoff Risk Zone so to lump this non diaring area with the tightest rules in Canterbury

I.e a 20 hectare winter feed limit rather than the 50 or 10% rule available in the rest of Canterbury is not consistent with the outcomes suggested by GMP on a farm by farm basis

Section: Section 14 Orari-Opihi-Pareora

Sub-section: 14.5 Rules

Provision

14.5.17

The use of land for a farming activity on a property greater than 10 hectares in area is a permitted activity provided the following conditions are met:

1. The property is registered in the Farm Portal by 20 July 2022 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every 36 months thereafter or whenever a material change in the land use associated with the farming activity occurs, or whenever any boundary of the property is changed; and
2. A Management Plan in accordance with Schedule 7A has been prepared and is implemented, and is supplied to the Canterbury Regional Council on request; and
3. Any increase in the area of the property that is irrigated is limited to 10 hectares above that which was irrigated at 20 July 2019 provided that no more than 50 hectares is irrigated in total; and
4. The area of the property used for winter grazing of cattle is less than or equal to:
 - a. 10 hectares for any property less than 100 hectares in area; or
 - b. 10% of the area of the property, for any property between 100 and 1000 hectares in area; or
 - c. 100 hectares, for any property greater than 1000 hectares in area; and
5. For any property that has part of the property located within the Rock Art Management Area, there is no irrigation on the part of the property within the management area; and
6. For any property that has part of the property located within the Mātaitai Protection Zone and that includes or directly adjoins any river or coastal lake, there is no irrigation or winter grazing on any part of the property within the protection zone; and

7. 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.

Proposed Plan Change 7 to the Land and Water Regional Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando
Date received 8/09/2019 5:54:06 PM
Submission #40

Address for service:

Morrison Ian / 40
353 Brockley Road Fairview Timaru 7974
Phone: 036861918
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Wishes to be heard? No
Is willing to present a joint case? No

Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).

- Could you gain an advantage in trade competition in making this submission?
- No
- Are you directly affected by an effect of the subject matter of the submission that
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition
- No

Submission points

Point 40.1

Submission

I oppose plan change 7 B 14.5.7 Part of property in HRRPZ because it puts an undue onerous rule on a group of dryland farmers predominately sheep and beef.

The scientific advice of p run off in the zone is all modeled and in fact the p levels are very low and showing no signs of elevating GMP will be the best avenue to follow and bring it into line with the rest of Canterbury Up to 15% reduction can be immediately gained through GMP. The reduction of winter feed to 20 hectares in this dryland South Canterbury climate with long winters will not be a mitigation of recent development but will be a cruel blow to farming practices over 100 years old and still the water from these farms is of very good quality. The fact that under this proposal if a farm has only a small amount of HRRPZ on their property the whole property is captured. This is unfair, has huge economic cost to per hectare low cost, low nutrient input farms in a challenging environment. The average cost per farm for compliance documentation and monitoring is \$14000 over 10 years and that's not taking into account the spend on riparian fencing at \$ 12 a metre plus planting.

We don't have many other options for farming on this area and even forestry is a restricted practice because of so called flow sensitive rivers.

South Canterbury's economy is very reliant on a strong agriculture sector and analysis of Plan Change 7 for GDP by LWP makes very sobering reading for this community. The lumping of all the orange zone into the red zone for only practical reasons is a very poor reflection of the work that has supposed to have been done on this plan

Relief sought

In 14.5.17.7 remove "not exceed 20 hectares"

And replace with 10 hectares for any property less than 100 hectares

10% of the area for any property between 100 and 1000 hectares

100 hectares for any property greater than 1000 hectares in area

Section: Section 14 Orari-Opihi-Pareora

Sub-section: General

Provision

General