

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

By **Adams, M**

Submitter Identification number: **PC7-554**

Wishes to be heard: **Yes**

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

Submitted on: **12/09/2019**

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 12/09/2019 1:49:50 PM  
Submission #84

### Address for service:

Adams Mark / 84  
51 Tondros rd RD 17 Fairlie  
Phone: 03 685 8184  
Mobile: 027 685 8184  
Email: mark.rocklands@gmail.com  
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?  
- Yes
- 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  
- Yes

## Submission points

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### Point 84.1

#### Submission

Not enough work has been done to identify the true source of the high readings for Nitrogen in the Fairlie Basin, Ashwick Flat and Sherwood Downs catchment. The planning maps are therefore too simplistic and too general.

#### Relief sought

The Fairlie Basin, Ashwick Flat and Sherwood Downs areas need to be separated and tested individually so that the "hotspots" can be more accurately identified and managed. More specific data should feed into better decision making.

**Section:** Planning Maps

**Sub-section:** General

#### Provision

General

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### Point 84.2

#### Submission

Farmers have already begun to modify their farm systems towards GMP and we are yet to see the results of this in the data. Ecan needs to continue to work along side farmers thru established catchment groups and individual Farm Environment Plans. All farmers should have a FEP. I believe that by ensuring that farmers connect their farm management and their farm systems to local water quality is fundamental to driving behaviour change. Farmers need the opportunity to demonstrate GMP.

Many farmers in the catchment are running extensive systems that have low N losses and are therefor not the problem. Penalising farmers that are already doing right by their land doesn't make sense. Targeting those farming systems that have high N losses and working with them is surely a better way of addressing N losses.

Ecan has the choice in this space to champion "Culture Change" or drive "Minimum compliance".

## Relief sought

Remove the requirement for a percentage of reductions beyond GMP until the wider implications of operating at GMP are fully understood.

Continue to test and monitor the water so that the effects of GMP can be accurately identified.

**Section:** Section 14 Orari-Opihi-Pareora

**Sub-section:** 14.6 Allocation and Water Quality Limits

**Provision**

14.6.4

## High Nitrogen Concentration Area Staged Reductions

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### Point 84.3

#### Submission

It is my understanding that the Upper Opihi and Opuha are generally low in P. Phosphorus was never flagged to us in the consultation process as being an issue outside of intensive wintering of cattle. The planning maps indicating areas prone to high P runoff must have been produced late in the consultation process because I am not familiar with them. The catchment group was never seriously consulted about P runoff and to say that the "community was consulted" is misleading.

It is also my understanding that P levels in the water merely reflect P levels normally associated with muddy river banks. It is also my understanding that our lower annual rainfall is not conducive to high P loss.

I think the 10% winter grazing rule is a good way of addressing winter P loss as well as farming to GMP. Both address the issues of scale.

#### Relief sought

Amend Policy 14.4.17 by deleting part d

**Section:** Section 14 Orari-Opihi-Pareora

**Sub-section:** 14.4 Policies

**Provision**

14.4.17

Water quality outcomes, limits and targets in Tables 14(a) to 14(g) in the Orari-Temuka-Opihi-Pareora sub-region are achieved by requiring:

- a. all permitted farming activities on properties greater than 10 hectares to prepare and implement a Management Plan in accordance with Schedule 7A; and
- b. all farming activities that require a resource consent to prepare and implement a Farm Environment Plan in accordance with Schedule 7 and implement Good Management Practice; and
- c. farming activities with the potential for higher nitrogen losses to not exceed the Baseline GMP Loss Rate; and
- d. farming activities within the High Runoff Risk Phosphorus Zone and which use more than 20 hectares of land for winter grazing of cattle or deer, to demonstrate through their Farm Environment Plan how active management of the loss of phosphorous, sediment and microbial contaminants to water will be achieved; and
- e. farming activities with irrigation and/or winter grazing within the Mataitai Protection Zone and that adjoin a surface water body, to demonstrate through their Farm Environment Plan how active management of the loss of phosphorous, sediment and microbial contaminants to water will be achieved; and
- f. farming activities with irrigation within the Rock Art Management Area to demonstrate through their Farm Environment Plan how adverse effects on tuhituhi neherā (rock art) sites will be minimised.