

Make Submission

Consultee	Mr Graham Patterson (64013)
Email Address	gandvpatterson@farmside.co.nz
Address	41 Mt Nimrod Road RD14 SOUTH CANTERBURY 7984
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Graham Patterson
Submission ID	V3pLWRP-74
Response Date	23/05/15 8:45 AM
Consultation Point	7 Mandatory Information (View)
Status	Submitted
Submission Type	Web
Version	0.1
If so	

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Address	41 Mt Nimrod Road RD14 SOUTH CANTERBURY 7984
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Graham Patterson
Submission ID	V3pLWRP-17
Response Date	23/05/15 8:45 AM
Consultation Point	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	
Supports in Part or Opposes in Part	

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Concern: Stock exclusion from waterways now includes (open) drains (Rule 15.5.19), although seemingly this is aimed more at intensively farmed stock (Policy 15.4.1).

Is there an expectation from council that fencing will be required for all waterways? This is a considerable expense for high country farms and deer farmers. It may not be fully effective in achieving better water quality if this is not related to stocking intensity.

Also, grazing of intensively farmed stock requires fencing around a water body or a 3 m wide vegetative strip around a water body from which stock are excluded. Cultivation also requires a 3 m wide vegetated strip around a water body. These GMPs differ to those being developed under the ECan Matrix of Good Management Practice (which cover more aspects of environmental management but are less prescriptive).

Concern: Requirements for operating at Good Management Practice (GMP) and a Farm Environment Plan for any activity subject to resource consent (Policy 15.4.5, Rule 15.5.2-5, Rule 15.5.3).

How will adherence to GMP be verified? As there is limited capability for assessing GMP in the drystock sector this will be extremely challenging to achieve.

There are no time frames specified so will ECan request evidence of GMP immediately? Following the Code of Practice for Nutrient Management and records to be kept and supplied to the council **upon request.**

The requirements to operate at good management practice – for example are we required to provide a OVERSEER nutrient budget every year considering the effort and cost involved? Also the problems associated with the availability of skilled consultants who can understand high country mixed farms and deer farm systems.

Concern: Understanding the nitrogen loss rates associated with the type of land/soil in the various areas in the sub-region (Tables 15(m) and 15(n) under section 15.7.6).

This is quite confusing as it has conflicting cap values. More standardising is required. Also, the availability (or lack thereof) of skilled consultants who can understand high country land/soils in various areas.

Concern: Understanding how the flexibility cap may work for low nitrogen emitters (i.e. an increase in nitrogen loss rate may be possible over time) and the maximum cap may work for high nitrogen emitters (i.e. an expectation that loss rates will be under the maximum cap over time). In particular how fair and reasonable is the nitrogen loss rate for farms in high country (5 kg N/ha/year).

Low emitter systems are seriously disadvantaged by being restricted to low nitrogen loss rates in perpetuity (grand-parenting for high country farms).

Concern: Is the formation of Nutrient User Groups beneficial for high country and deer farmers?

There is not enough information for farmers to be able to understand in detail how such a group would operate and if groups were established would this negatively impact on farms in the same areas/zones/soils **that were not** in a group?

Often there is a cost to carry out these changes and potentially the cost may force the business to cease to operate or substantially change so that is no longer carrying out the same business.

The soundness of the underlying data and science that informs the reason for a plan change (e.g. is the water quality data reliable? Are the models used to estimate environmental impacts, nutrient losses, economic impacts etc. robust?)

The “consultation” and development process has taken two years however some organisations may wish to read the reports and engage specialist advisors.

Sheep and beef farmers feel that representation in the NARG (Nitrogen Allocation Reference Group) was not reflected in the proposed Variation 3 (despite the NARG decisions being claimed to be by consensus). Also, the inclusiveness of the process to determine the plan change - has it adequately taken into account **all** the affected parties?

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Getting a definition of “intensively farmed stock” is required.

Fencing should not be required for all waterways specifically high country, extensive farms and extensive deer farming operations.

Clear explanation and standardised guidelines of GMP

Clear structure for the verification/auditing process structure for GMP.

Sensible time frames for compiling evidence to support the farm’s GMP/Farm plan.

Council employing skilled consultants who understand the high country land and soils in various areas.

Council employing skilled OVERSEER consultants who understand high country farming and deer farming systems.

Not requiring drystock farmers to produce an OVERSEER nutrient budget every year.

Not locking in low emitter systems to low nitrogen rates **in perpetuity**.

Standardising the playing field for cap values – as per Otago plan.

Ensuring the process including the Nutrient User Groups has representation from ALL sectors of the farming community.

Ensure that costs are not prohibitive to farming operations.

Ensure that data and science are robust and reliable by not relying on one method of data collection to back up your theories.

Sensible and appropriate time frames, considering the time it has taken councils to produce plans, to allow interested groups to read reports and engage specialist advisors without undue pressure.

Choose one of the following three

Tick relevant topics