

Tabled at Hearing on 5th November 2015

Verbal Submission to Hearing Commissioners
Proposed Variation 3 to the Proposed and and Water Regional Plan
Section 15 – Waitaki and South Coastal Canterbury

William Rolleston
Blue Cliffs Station
5 November 2015

My name is William Rolleston, I farm Blue Cliffs Station in partnership with my brother John and together we also own and run a biological company, South Pacific Sera, which utilises our farm animals for the production of biologicals for supply to the pharmaceutical, diagnostic and research industries. We employ around seventy people at Blue Cliffs and at our Timaru facility where material is further processed.

Blue Cliffs Station and its associated properties sit on the southern, true right bank of the Otaio river and by my reckoning occupies approximately 17% of the catchment. Our property extends into the Otaio Gorge, an area highly valued for its amenity and ecological values by our family and the local community.

I am also national president of Federated Farmers who presented to you this morning. I mention this as, while I support their position, this submission is a personal one relating specifically to Blue Cliffs Station, the Otaio River and its catchment.

For this reason I will not be presenting on the broad issues of nutrient allocation other than to say that the rules decided should give effect to the outcomes of the Nutrient Allocation Reference Group and that those rules should be flexible to take account of the evolving science in this area. Constant plan changes while possible do not meet the test of efficiency.

Given the time constraints of this plan development I understand that we have not got as far as we would have liked but I hope the journey will evolve to a situation where all the farmers in the catchment can consider the catchment as a whole and collectively; can take ownership as a community of the issues and the opportunities to increase the river values; and that the rules will enable us to monitor our environment and take appropriate actions by using tools such as Overseer to identify where we can make the most difference rather than simply applying prescriptive numbers.

I prepared my written submission with the assistance and guidance of Pattle Delamore Partners and I am pleased to see that many of the issues raised have been addressed and I support the changes recommended by the reporting officer. However I would like to make two points:

- I consider that caution should be used in restricting nitrogen losses in the Northern Streams Hill zone, particularly where the ratio of hill country to "plains" is considerably lower than it is for example in the red zones of the Waihao-Wainono catchment. The work to establish a low limit on the hill areas and the effect of stocking increases in this area have not, in my

view, been reliably established and, if inaccurate, could unreasonably limit options for hill country farmers in these catchments. In addition the restriction of nutrients between the Hill and Plains areas limits management options when a property, such as ours, is contiguous across the boundary. Our submission to define a Farming Enterprise was an attempt to mitigate this intra-property restriction but was rejected by the reporting officer. We agree with the intention to restrict inappropriate use of nutrient transfer between Hill and Plain property which may be physically separated but we ask that the commissioners consider how this may be enabled where a property is contiguous and managed as a unit.

- I have requested deletion of a reference to the St Andrews Stream which the plan says has its lower catchment boundary at the Otaio Gorge recorder site. The reporting officer has asked we provide another name but the point is that this stream does not appear to actually exist and is not marked on the planning maps. An alternative name would perpetuate the problem.