

From: [Maurice Hellewell](#) on behalf of [Maurice Hellewell - Organic Futures](#)
To: [Mailroom Mailbox](#)
Cc: valeview@farmside.co.nz
Subject: submission on plan change 5 hellewells
Date: Thursday, 10 March 2016 7:13:25 a.m.
Attachments: [CCE10032016.pdf](#)

Please add this to you submissions to plan change 5
Thank you Maurice Hellewell



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Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

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Submitter ID:

File No:

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 11 March 2016 to:

Freepost 1201 Plan Change 5 to LWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Herbert Maurice Hellewell Phone (Hm): 036892252
Organisation*: Arnstead Organic Farm Phone (Wk): 036892252
* the organisation that this submission is made on behalf of
Postal Address: No 7 R.D. Phone (Cell): 0276892252
Waimate Postcode: _____
Email: Maurice.h@organicfutures.co.nz Fax: _____
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: 10/3/2016

(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 your submission in a joint case with others making a similar submission at any hearing

About myself and my farm

- My name is Maurice Hellewell my wife Neroli and I farm a certified organic mixed livestock trading , crop farm of 65ha. We specialise in producing high value produce for overseas and local markets .
- Our family have farmed here for just on 70 years, My parents were one of five families who milked cows for thirty years. I have lived here most of my life and know the catchment and the changes in farming practice over this period very well.

Under the operative land water regional plan (lwrp) our farm is located in the red zone (greater Waikakahi)

- Our farm is irrigated using water from the MGI irrigation scheme
- Under MGI Consent we are required to operate under a Farm Environment plan including an overseer nutrient budget which is audited annually
- We have an annual organic audit by BIO- Gro who are an MPI accredited TPI that audit to international standards . Part of that audit is a environmental plan also we have limits on stocking rate and total Nitrogen from natural sources.
- Our farm also runs a food safety plan audited by MPI annually'

Our Understanding of the community process and expected outcome from Section 15b of the plan change 5 (waitaki sub-Region)

- 5.44A Our farm is over 50 of irrigation and is over 20ha winter feed and in a red zone
- 5.44B Our farm meets the requirements of this clause so we will be controlled activity until 2020
- 5.48A After 2020 my concern is that because of the use of overseer for modeling we may not meet the conditions rule 2, 5.45A and could fall into an unlawful activity
- During the community meetings we were told by ecan staff not to focus on the numbers but rather ways we could improve water out comes within the district . The whole plan is about numbers we should have had the opportunity to see how those numbers would affect our farm . Only now do we have some tools (the potal) to do this yet very limited time to make submissions to this plan .
- The community wanted more water monitoring of identified sites and areas of potential concern. The outcomes of this would impact on the plan, There is no mention of this within the plan
- During the community meetings we told that plan change 5 would replace the zones this is not the case . We are red zoned and we have not seen enough evidence to say we should have this incomburance compared to our neighbouring zone that is green.
- During the community meetings we asked for a plan that was closer to a modified equal allocation model or land use capability model this have been totally ignored .

The closest we have to this in the plan is GMP and the 90% of GMP for red zones. The headroom gained from this and from the work that have already been done in the district since the modeling was done should be enough to allow some land use change within the catchment. What we have from the plan is 50ha of irrigation and 20ha of winter feed no one is under 50 ha irrigation and only 4 farms may qualify for the 20 ha of winter feed . 90% of farms in our catchment will have to have a consent to farm

Reason for my Submission

- I believe this plan is unworkable and very difficult to understand My expectation as a farmer of the plan is that I should be able to pick it up and determine on my own where i fit in without having to pay consultants to do this work for me
- In my view the plan is unenforceable . There is an emphasis on numbers generated by an averages model that has an accuracy of plus or minus 30% . Farmers are spending a lot of time and money getting overseer modeling done to try and model their farm to meet the requirements of plan change 5. Really they are just manipulating the numbers when this time and money could be put into practical changes that could directly improve environmental outcomes.
- I believe the plan is inequitable as it does not allow low emitting farms on the same land to have capability to increase their Nitrogen load similar to their neighbors. This is very much a grandfathering plan . Our farm has been low emitting on purpose so that we had environmental capital for future use so that farm succession can be achieved.
- The community Intent was not reflected in this plan

What I seek from my submission

I would like to have more time as part of a group to go over our numbers to see what change need to happen to the plan to make our farm economic yet meet the environmental requirements of plan change 5 .

I find it hard to understand when we run the numbers on our certified organic farm that we may be at risk of farming unlawfully

I understand a group of concerned farmers within the greater waikakahi are putting in a submission to PC5 we would like to support that submission

Maurice and Neroli Hellewell