

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

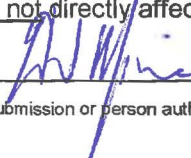
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Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

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

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

Full Name: DONALD WARD MCKENZIE	Phone (Hm): 03 615 7497
Organisation*:	Phone (Wk): 027 6596 033
* the organisation that this submission is made on behalf of	
Postal Address: 274 Sour Hut Road RD25 Temuka 7985	Phone (Cell):
Email: pipanddonald@outer.net.nz	Postcode: 7985
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:	
<input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission; or	
<input type="checkbox"/> I could gain an advantage in trade competition through this submission.	
If you have ticked this box please select one of the following:	
<input checked="" type="checkbox"/> I am directly affected by an effect of the subject matter of the submission	
<input type="checkbox"/> I am not directly affected by an effect of the subject matter of the submission	
Signature: 	Date: 8-3-2016
(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.	

<input type="checkbox"/>	I do not wish to be heard in support of my submission; or
<input checked="" type="checkbox"/>	I do wish to be heard in support of my submission; and if so,
<input checked="" type="checkbox"/>	I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

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

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

Full Name: Donald McKenzie

Phone (Hm): 03 615 7497

Phone (Wk): 027 659 6033

Postal Address: 274 Spur Hut Road, RD 25 Temuka

Postcode: 7985

Email: pipanddonald@outer.net.nz

Contact name and postal address for service of person making submission (if different from above):

I wish to be heard in support of my submission.

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:



Date: 08 March 2016

Please note: (1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

My Submission:

About myself and my farm:

- My name is Donald McKenzie. Until recently, I have lived in the Hakataramea Valley. My family have farmed Table Top since 1890 and I am actively involved in the farm's management. My three children attended Hakataramea Valley School and Kurow Area School.
- I am the chairman of the Hakataramea Valley Nutrient Allocation Group (HVNAG).
- Under the operative Land and Water Regional Plan (LWRP), my farm is located in an orange nutrient allocation zone, which I understand to mean that water quality outcomes are at risk of not being met.
- My farm is a dryland sheep and beef farm with an area of 2448ha, the majority of my property falls in to the flat zone, with a small amount in the hill zone and 4ha in the river zone.
- I am not currently subject to any conditions that require me to have a Farm Environment Plan. I have had my Overseer N baseline determined and it is 3kg/ha/year. I grow upwards of 20ha of winter feed crops.

My understanding of the community process and expected outcomes from Section 15B of Plan Change 5 (Waitaki Sub-Region):

- That the ultimate outcome of the community consultative process is to maintain water quality in the Hakataramea Valley river.
- This requires land owners to manage nitrogen, phosphate, and sources of E coli to achieve this outcome.
- If good management practice (GMP) and community agreed rules specific to the Hakataramea Valley nutrient management unit are followed, no consent will be required to farm as we have in the past.
- Community buy-in and ownership of this process is essential if it is going to work. The emphasis was not on Overseer outputs, but rather actual water quality in our rivers and streams. This is of huge importance to the Hakataramea Valley community as water quality in the Hakataramea River is beginning to show a declining trend. Coupled with potential further abstraction compounding already low river flows, declining water quality has the potential to impact on the farming community as a whole.

Reasons for my Submission:

- I believe Plan Change 5 (PC5) has overly complicated rules that are difficult to understand. Land owners will find PC5 difficult to interpret, and these will be open to manipulation as well as litigation by those who wish to exploit them.
- In my view it is unenforceable. Every expert I have referred to regarding this matter has a different interpretation to PC5. This will make compliance and monitoring a very difficult task.

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- Most farmers under PC5, including myself, would require a consent to farm. This is a huge number of consents, and is another layer of consenting that I consider being totally unnecessary. I am more than happy to operate under a Farm Environment Plan and abide by GMP.
- I believe PC5 is unfair as it treats all farm types the same, for example:
A good dry land winter feed crop of oats or ryecorn in the Hakataramea Valley will yield a maximum of 5000kg/dm/ha where as a good irrigated crop of fodder beet will yield 30000-40000kg/dm/ha; therefore the nutrient load per ha is vastly different. Dryland farming in the Hakataramea Valley requires flexible management to utilise the different amount of dry matter grown each season. Any restrictions as a result of declining water quality in the river may have dire economic consequences for these properties.

What I seek from my submission:

I am aware that the Waitaki Irrigators Collective, as part of their submission, has proffered an alternate rule framework that is simple, workable and enforceable, and does not result in obscene numbers of additional consents being required. I wholly support their submission and the outcomes sought.

