

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:

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

Full Name: Mark John Fraser Hurst **Phone (Hm):** 036892626
Organisation*: _____ **Phone (Wk):** _____
* the organisation that this submission is made on behalf of
Postal Address: 683 Ikawai Middle Rd **Phone (Cell):** 0274221789
980 Waimate 7979 **Postcode:** 7979
Email: markandcarmen@farmside.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: Mark Hurst **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.

- ☐ 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

My Submission;

- My Name is Mark Hurst. I am a third generation farmer, farming a property in the "Greater Waikakahi Zone". I am also director of the MGI Irrigation Scheme .
- Our children attend the local school, and we employ 4 staff that all have input into the local community.
- We farm a 300ha Dairy Farm, wintering all cows on farm. As it is recently converted, the farm has new efficient spray irrigation system with water meters. We have 40 days storage with our effluent system and all effluent is dispersed evenly at a low dispersal rate through the pivot irrigators.
- The water for irrigation is supplied from MGI, and part of their consent requires me to have a Farm Environment Farm (FEP) which includes a nutrient budget. The FEP is audited annually.
- All waterways are fenced off, and trees are planted in waste areas. All efforts are made to make sure we farm in an efficient and sustainable manner.
- We entered into the community consultation with Environment Canterbury staff in good faith and I feel we have made some progress. I do however believe that the goal posts keep on being moved, causing confusion, disappointment and a disillusionment of not having been listened too.

My Submission relates to section 15b.4.10-15b.4.22&15b.4.26 of Plan Changes 5 (Waitaki Sub- Region)

- As the water outcomes in the catchment area were not sufficient, we discussed as a group that high emitters come down to allow some N loss headroom for farms that were not fully developed to be able to come up in the future. Under the plan this has been dismissed and everyone has to come down to 90% below GMP (as all farms but 4 are restricted discretionary) creating more headroom than required.
e.g. 4 farms crop 19 ha creating 50kg N leaching or 950 kg of N vs the 25000kg created by going at 90% of GMP
- One of the outcomes was to improve the water quality of Waikakahi stream, and as a group we wanted to progress the idea of ornamenting the stream with an environmental flow. There is no process for us to do this under the plan.
- During the consulting process the ECan staff were at means to point out "don't worry about the Overseer numbers", but the farm portal is all about the numbers. I am concerned that Overseer will be used as a regulatory tool, and as it is proven to be up to 30% inaccurate it is very dangerous to put so much weight behind it. There are farming businesses and livelihoods at stake. GMP should be more than just a number that comes out of Overseer.
- We, as irrigated farmers in this area all have FEPs that are audited each year. We suggested that there is more detail put in them as they are a more practical and transparent way to manage management practices on farm, and will have a better result. Overseer will be a part of this but the weighting will be reduced.
- The plan is all very confusing and things in it are changing all the time e.g. different zones and what they all mean. I have been to most of the meetings over the consulting process and am still unsure about exactly where my farm fits and what is required. I know a lot of people in the area that have given up trying to understand it. Surely we need to simplify it all to engage these people again so we can get the water quality outcomes we require. I feel this is all set up to fail.

What I seek from my submission

- For the Waikakahi zone to comply with only being at GMP not 10% below by 2020.
- For less emphasis put on the Overseer numbers that come out of Overseer
- More a practical frameworks to be put in place around GMP and that they are part of the FEP