

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

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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: [Signature] Date: 11-03-2016
(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.

FILE REF: <u>Plan/wtak/1P/6su/2</u>
EXPIRES: <u>30405</u>
11 MAR 2016
<u>Drett Aldridge</u>

About me and my farm:

- My name is Mark Kingsbury, I have lived in the Waitaki Valley with my wife and family for more than 20 years. I am a director of the Lower Waitaki Irrigation Company and a member of the Lower Waitaki Zone Committee.
- We farm a 340 ha dairy support/bull beef finishing block at Otekaieke.
- Of the 340 ha, 120 ha of our farm is irrigated using water from the Kurow-Duntroon Irrigation Company (KDIC).
- Under the operative Land and Water Regional Policy (LMRP) my farm is located in a green nutrient allocation zone, which I understand to mean that water quality outcomes are being met.
- KDIC takes water from Lake Waitaki. As part of the conditions of this consent, I am required to operate under a Farm Environmental plan, which includes an Overseer nutrient budget, which is audited annually.

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

- Provided my farm had implemented and was operating under the industry agreed Good Management Practises (GMP), then I would be able to continue to farm as I had been.
- Expectation around GMP would be defines within the plan, and would include a range of practises and outcomes, not just be solely focussed on nitrogen.
- This would not require a resource consent.
- With greater emphasis put on actual water quality readings of our waterways, not on projected Overseer outputs.

Reasons for my submission:

- The plan is difficult to understand. Farmers need clear, concise direction and information on how to be compliant and/or improve environmental performance.
- Under this plan, a large number of farmers, including myself, would require a consent to farm. This seems ridiculous and unnecessary given that my property is in a green nutrient allocation zone and the water which I use to irrigate from the KDIC scheme has strict water quality management conditions already.
- Farmers are unable to pass on the cost of this extra 'compliance' and do not need the extra cost associated with meeting these new 'targets'.
- In the proposal, good management practises (GMP) are defined by an Overseer output number. GMP should be about what actually happens on farm, not something that is made into a model on a computer screen. In addition, GMP which are relevant and appropriate for our catchment should be better defined, so that they can be quantified, monitored and enforced. Furthermore, these GMP being better defined will help farmers know what is expected of them.
- Our farm is two-thirds dryland, in a dry season its capacity to graze stock is effectively zero. Therefore, we have to intensively manage the irrigated area to feed our animals and remain economically viable. Under the proposal you would require another consent just to do this.
- As a LWC member my understanding was that those who farm in a green nutrient zone would be able to carry on with their current farming practises, provided that they used GMP. If there was a measurable deterioration in water quality then the relevant GMP would be reviewed. Those who farm in other nutrient zones would have to comply with stricter conditions in order to improve water quality in those catchments.

What I seek from my submission:

- I am aware that the Waitaki irrigators Collective, as part of their submission, has proffered an alternative frame work that is simple, workable and enforceable. Thus, not resulting in an obscene number of additional consents being required. I wholly support their submission and the outcomes sought.