

**From:** [Timbridge Pastoral Ltd](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Pl Ch 5 Submission from James & Therese Banks  
**Date:** Friday, 11 March 2016 11:33:02 a.m.  
**Attachments:** [Pl Ch 5 Submission TB.docx](#)

---

Dear Sir/Madam

Attached is a submission that relates to Plan Change 5 to the Canterbury Land & Water Regional Plan.

Grateful if you would acknowledge receipt.

Thank you

Therese Banks

# Resource Management (Form, Fees and Procedure) Regulations - Schedules 2003 - Form 5

## *Clause 6 of the First Schedule, Resource Management Act 1991* **Submission on a publicly notified proposal for a plan or plan change**

To: Environment Canterbury  
PO Box 345  
Christchurch

### **Name of Submitter:**

James and Therese Banks

This is a submission on the following proposed plan – **Plan Change 5 to the Partially Operative Canterbury Land and Water Regional Plan**

We could not gain an advantage in trade competition through this submission.

### **BACKGROUND TO SUBMISSION**

As famers in North Canterbury, we are committed to addressing land uses and farm practices that are resulting in deterioration of our water.

We want to obtain quality information to better understand water quality issues. However we must retain flexibility in our land use. We need management or regulatory intervention to be focused on dealing with the actual issues and to be 'ground truthed'.

We do not support planning regimes that require us to comply with a lot of bureaucracy where will not result in any improvements in environmental outcomes on the ground. We do believe that like us the majority of farmers are working towards good environmental management practices.

We also note that Plan Change 5 has made changes to both the policy positions for management of nutrient losses from farming activities in the various water quality zones, and we believe the amount of bureaucracy required for this is too resource intensive.

### **OUR SUBMISSION**

Farmers must retain flexibility in their land uses within limits for N loss that are appropriate considering both the need for farmers to make reasonable use of their interests in their land, and the sensitivity of the receiving environment.

We believe all farming activities should use the industry agreed Good Management Practices or other appropriate farm management programmes to minimize the risk of N or P/sediment losses to water.

We do not agree that all farmers should register their farming activities on a new farm portal, without any information about how or by whom that information will be used or will be accessible to under the Local Government Official Information and Meetings Act 1987.

The important part of Plan Change 5 is ensuring farmers, especially those with higher N or P/sediment losses are operating in accordance with Good Management Practices. The GMP Loss Rate number itself is only of a value if it can provide a reasonably accurate numerical representation of those actions.

It isn't clear why people who are already irrigating up to 50 hectares of land in a Red Zone may be a permitted activity, but those irrigating less than 50ha can only increase their land irrigation by 10ha and remain a permitted activity. We do not believe this is a logical approach to resolving problems.

The requirement to prepare a Farm Management Plan in accordance with Schedule 7A which is produced for Environment Canterbury on request is an example of unnecessary bureaucracy that costs time and money but is of no benefit to improving water quality. We believe a more effective approach would be to encourage farmers to focus on best practice on farm. Many farmers already partake in farm management planning either through their grower representative bodies or through farm consultancies. Many of these programmes are more advanced than the industry articulated GMP.

This would be better replaced with a condition requiring all farmers to operate in accordance with an industry-recognized farm management programme or in accordance with any relevant provisions in the *Industry-Agreed Good Management Practices Relating to Water Quality – September 2015*.

It is incorrect to assume any farming activity which does not meet the conditions for a permitted activity will have a high N loss number. There are examples of properties in North Canterbury which are irrigating more than 50 hectares of land for sheep production, viticulture, horticulture or other crops and have very low N losses. Should the markets for these activities change, they have very few options should they be confined to their N baseline or GMP loss rate.

*We believe within the Red, Orange, Green or Blue Nutrient Allocation Zones, any farming activity is a permitted activity if it complies with all of the following conditions:*

- 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the *Industry-Agreed Good Management Practices Relating to Water Quality – September 2015**
- 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares*
- 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property.*

*Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it is undertaken in accordance with an industry recognized farm management programme or in accordance with the *Industry-Agreed Good Management Practices Relating to Water Quality – September 2015*; and*

*The estimated nitrogen losses from the farming activity as modeled in Overseer do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity.*

We do wish to be heard in support of our submission.

James & Therese Banks

11<sup>th</sup> March 2016

Address for service:

Spurtleton Downs, 27 Sloss Road, 3 R D Amberley 7483

Ph: 027 3145811

Email: jtabanks@xtra.co.nz