

From: [Bridget Banks](#)
To: [Mailroom Mailbox](#)
Subject: Pl Ch 5 Submission
Date: Friday, 11 March 2016 12:06:50 p.m.
Attachments: [Pl Ch 5 Submission_B Banks.docx](#)

Please find submission attached,
regards

Bridget Banks
Spurtleton Downs
25 Sloss Rd
RD 3
Omih 7483

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:

Bridget Banks

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

I can not gain an advantage in trade competition through this submission.

BACKGROUND TO SUBMISSION

As a farmer in Omihi, I am committed to best farm practice, including that in relation to preservation of our water quality.

I cannot support planning regimes rolled out that require compliance with a lot of bureaucracy which will not result in any demonstrated effective improvements in environmental outcomes.

I 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 I believe the amount of bureaucracy required for this is too resource intensive.

MY SUBMISSION

I 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.

I 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.

Also, 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. I 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. I 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.

I do wish to be heard in support of this submission.

Bridget Banks
11th March 2016
Address for service:
Spurtleton Downs,
25 Sloss Road
R D 3
Amberley 7483
Ph: 021-0232-8654
Email: bridget_banks@hotmail.co.nz