From:	MFS Books
To:	Mailroom Mailbox
Subject:	FW: Attached Submission
Date:	Monday, 14 March 2016 10:07:53 a.m.
Attachments:	CCE11032016.pdf
Importance:	High

From: MFS Books [mailto:mfsbooks@gmail.com]
Sent: Friday, 11 March, 2016 1:06 p.m.
To: mailroom@ecan.govt.co.nz
Cc: 'Greg & Jo ' <calwarra@gmail.com>
Subject: Attached Submission
Importance: High

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

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

FOR OFFICE USE ONLY

Submitter ID:

File No:

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: Greg Nelson.

Organisation*: MFS Ventures Ltd

* the organisation that this submission is made on behalf of

Postal Address: 39 Whartons Rd.

RD 11 0 Oamaru

Email: calwarra@gmail.com

Phone (Hm):

Phone (Wk):

Phone (Cell): 027 4477615

Postcode: 9492.

Fax:

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

As 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: _____ **Date:** 11/3/16.

(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

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My Submission

About me and my Farm

- My name is Greg Nelson. We have farmed in the Waitaki region for the past 8 years. We are actively involved in the local community, providing employment as well as filling directorship roles in Kurow Duntroon Irrigation Company and Haka Valley Irrigation Company.
- Under the operative Land and Water Regional Plan (LWRP), one of our farms 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 combination of irrigated and dryland.
- I am currently subject to conditions that require me to have a Farm Environmental Management Plan and comply with water supply agreements as well as a nutrient load limit associated with our property in the Haka Valley.

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 Practice (GMP), then I would be able to continue to farm as currently consented.
- Expectations around GMP would be defined within the plan, and would include a range of practices and outcomes, not just focused on Nitrogen. This is particularly important for the Hakataramea River as sediment and phosphorus from wind-blown soils are considered to be a large nutrient source.
- This would **not** require a resource consent in most cases.
- The emphasis was not on Overseer outputs, but rather actual water quality in our rivers and streams. This is of huge importance to the Hakateramea Valley community as water quality in the Hakateramea River is beginning to show a slight 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. However it should be noted that current water quality is well within ECAN environmental guidelines.
- I participated in the community consultation meetings and it is disappointing to see that very few of our recommendations have been taken up.

Reasons for my Submission

- The Plan is totally unworkable and very difficult to understand. My expectation of the plan as a farmer, is that I should be able to pick it up and determine on my own where I fit in.
- It is my view that it is unenforceable. There is still an emphasis on numbers generated by an averages model that has an accuracy of plus or minus 30%, and information, which is not subject to any quality assurance, is entered into a portal system. A model is only as good as

its inputs: rubbish in = rubbish out. It also does not necessarily demonstrate environmental effects of changes in various on farm practices.

- GMP should be about actual on farm practice and yet, this plan links GMP to an Overseer output number. The GMP practices that are appropriate for our catchment should be better defined in the plan. These are then easily monitored and enforced as well and the expectations for farmers are clear.
- Most farmers under this plan, including me, would require a consent to farm. This is a huge number of consents, and is another layer of consenting that I consider to be totally unnecessary. I am more than happy to operate under a Farm Environmental Plan and abide by GMP.
- I have grave concerns around the accuracy of Near River mapping as the definition of Flat Land vs Near River land is crucial.
- I am also concerned about the proposed prohibition on any type of development. This has implications for the future economic viability of the community as a whole.

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.