

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of the hearing of submissions on Proposed
Plan Change 5 (Nutrient Management and
Waitaki Sub-region) to the Canterbury Land
and Water Regional Plan

BY **DONALD MCKENZIE**
Submitter

TO **CANTERBURY REGIONAL COUNCIL**
Local authority

STATEMENT OF EVIDENCE OF DONALD WARD MCKENZIE

Dated 19 July 2016

INTRODUCTION

1. My name is Donald McKenzie. Until recently, I have lived in the Hakataramea for many years. My farm in the Valley - Table Top - has been farmed by my family since 1890. I am still actively involved in the farm's management. My three children all attended Hakataramea Valley School and Kurow Area School.
2. I am the Chairman of the Hakataramea Nutrient Allocation Group ("**HVNAG**") established by Environment Canterbury as a sub-group of the Hakataramea community catchment group. The aim of the HVNAG was to develop community agreed rules and objectives on nutrient allocation within the Hakataramea Catchment and present those agreed rules and objectives to the Zone Committee.

SCOPE OF EVIDENCE

3. My evidence will discuss the following:
 - (a) my farming operation;
 - (b) the implications and effects of the proposed Plan Change 5 in the Hakataramea; and
 - (c) the outcomes sought by the HVNAG.

MY FARMING OPERATION

4. My farm in the Hakataramea is a dryland sheep and beef farm with an area of 2,448 hectares. Under the original provisions of the Land and Water Regional Plan, my farm was entirely within the 'orange' Hakataramea Nutrient Allocation Zone.
5. Under the proposed provisions of Plan Change 5, the majority of my property falls into the Hakataramea Flat Zone, with a small area in the Hill Zone, and four hectares in the River Zone.
6. I have run the OVERSEER programme to determine what my nitrogen baseline figure is, and it is 3kg/ha/year.
7. On the eastern side of the Hakataramea Valley with an average rainfall of 420mm, the climate is the moderator. I would consider 5000kgs of dry matter (DM/ha/year to be a good dryland winter feed crop compared with irrigated Canterbury plains where 1700 to 40000kgs of DM/ha/year is normal.
8. My family and staff swim in the Hakataramea River every summer.

PLAN CHANGE 5

9. Under the proposed rules, I would be required to get a land use consent if I have 20ha or more of fodder crop for winter grazing by cattle.
10. Under Plan Change 5, the Hakataramea Catchment has essentially changed from an orange zone to a red zone. This has effectively capped the nutrient load available for dryland farmers. This has implications for the future as it removes flexibility for development. I have low baseline OVERSEER figures because I have considered the environment in my farming practices for the past 37 years.
11. The community felt that the basic rules of stewardship that everyone can understand would have far more value within our catchment than a set of numbers generated by a Farm Portal model (which are potentially open to manipulation).
12. There is an agreed sensitive area adjacent to the Hakataramea River identified as the Hakataramea River Zone. Parts of this area are currently consented for development, some of which has been completed. The HVNAG agreed that this area should have its own set of nutrient values to take into account the alluvial gravels and proximity to the Hakataramea River. The consented intensification that has occurred on this developed land appears contrary to GMP and community values. I am concerned about intensification near the River and its effect on the water quality.

HVNAG AND COMMUNITY OUTCOMES

13. The Hakataramea catchment group, followed by the HVNAG, came together many times to determine what the community's values and aspirations were, and ultimately what outcomes we were seeking for our River.
14. It was generally agreed that we wanted to maintain water quality in the River, and prevent any future degradation.
15. However, the process to turn this aspiration into rules that worked for the catchment proved to be extremely challenging. There was a need to balance the desire to allow for some future development, whilst ensuring all current land-use minimised its environmental impact by adopting good management practices, with any future intensification being done sustainably,.
16. It was always going to be difficult in a sensitive catchment such as the Hakataramea, and this was not helped by the long lead-in time to the process set by Environment Canterbury, followed by a rush at the end of the process to get principles written-up.

17. I recall a very robust discussion amongst community members and the Lower Waitaki South Coastal Canterbury Zone Committee which occurred when the Committee adopted wording for its Zone Implementation Plan Addendum.
18. However, when the draft Plan was released, I was surprised at its content. The rule framework is extremely complex, and I feel it will be very difficult for farmers to pick up the Plan and see where they fit, and what is required of them. I certainly do not think the community anticipated the proposed level of consenting would be required, particularly those that are already undertaking good management practices, and have a limited environmental footprint.
19. I do not understand how Environment Canterbury will be able to implement and monitor such a complex rule framework. Every expert I have spoken to has given me a different interpretation of the rules. Compliance with the rules will be very challenging.
20. I am aware that phosphorus, along with nitrogen, must be managed if water quality is to be maintained. In dry inland valleys, phosphorus may be the main contributor to declining water quality. Farmers have spent the last 30 years reducing soil erosion through increased use of conservation tillage, planting of shelter, fencing and use of more persistent plant species. There is nothing in the Plan addressing any of these methods to improve water quality.

CONCLUSION.

21. The community worked well together in 2015, with considerable use of time and energy, to deliver a set of rules and objectives for the catchment that would safeguard water quality and allow some development to occur in the future. It appears that the recommendations of HVNAG, that were developed with advice from Environment Canterbury, have been largely ignored. I am concerned that the community has lost faith in the process.
22. I do not believe that a complex system with consent-to-farm rules will help achieve the community-agreed outcomes for the Hakataramea Valley.

Donald McKenzie

22 July 2016