

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 **TWIBNURN STATION LIMITED**
Submitters

TO **CANTERBURY REGIONAL COUNCIL**
Local authority

STATEMENT OF EVIDENCE OF WENDY PARSONS

Dated: 22 July 2016

INTRODUCTION

1. My name is Wendy Parsons. My husband and I operate 2 farms at Omarama, namely Twinburn and Clifton Downs. We run a sheep, beef, and dairy support operation. Both farms are located in the head waters of Omarama Stream.

SCOPE OF EVIDENCE

2. My evidence will provide information about our farming operation and how the proposed rules under Plan Change 5 will affect us.

OUR FARMING OPERATION AND THE CONSENT PROCESS

3. Twinburn was 7,861ha until Tenure Review was completed. It is now only a fraction of this at 671ha, of which 64ha is irrigated. Clifton Downs is 1,245ha of which 214ha is irrigated. We run a sheep, beef and dairy support operation of currently 9000 stock units and increasing as the benefits of our irrigation development are beginning to show but also as we learn more about the how to make the most efficient use of the water and using different grass types.
4. The properties are located in the Omarama Stream catchment, which drains into the Ahuriri arm of Lake Benmore. Part of the properties had always been irrigated with border dyke irrigation for many years.
5. We applied to renew our water rights in 2001. However, the applications were called in as part of the ministerial call-in under the Waitaki Act, and subsequently, we went through Upper Waitaki Hearings in 2009.
6. The hearing process was long. We did not get our consents granted again until 2012. However, the decisions were appealed, and the final issue of the consents was not until 2014. CRC167125 expires on 24 May 2047 and CRC167126 expires on 30 April 2030. We are the only consent holder to have come out of the hearing process with expiry dates of beyond 30 April 2025.
7. It took 13 years to renew our water rights.
8. As a result of this we now have consents with a Nutrient Discharge Allowance (NDA) for both N and P as well as extensive water quality conditions on Omarama Stream and the Ahuriri Arm of Lake Benmore. We also have to implement a Farm Environment Plan (FEP) as part of consent requirements, which is audited annually.
9. We have undergone a period of development over the last 3 years, converting from border dyke irrigation to centre pivot irrigation, as well as building a water storage pond.

10. Throughout our development, we have been absolutely pedantic about the consenting side. It has been a very costly exercise to make sure everything we did was compliant. I have a paperwork trail of fish screen designs, pivot designs, stock water system, additional council permits, irrigation evaluations, FEP documents, soil moisture records... and the list goes on.

THE COSTS OF THE CONSENTING PROCESS

11. The total cost of the renewal of our water rights alone is \$575,415.55 to date. This can be broken down into consultants \$237,556.02, lawyers \$118,026.64, Environment Canterbury \$148,462.41, and other \$28,234.18. We have also spent \$43,136.30 on water quality sampling and mitigation.
12. This does not include the financial cost of not being able to begin the development 13 years ago, nor the massive amount of our time spent on it. But most importantly there is no measuring stick or cost you can put on stress and the emotional rollercoaster ride of this process. This still remains the biggest impact to us, and continues to do so, as we watch other water users who are not subject to the same level of consent compliance as we are, have no respect for the rules, run amuck in our area.

MY EXPECTATIONS OF PLAN CHANGE 5

13. It has taken 13 years to get a consent, and here we are again having rules changed. Have developed under the premise that the NDA granted on our water permits would continue until at least expiry of our water permits, I am distraught at the thought of another consenting process. We are still recovering financially from the last consenting process and this means that the rest of our development is not possible for another few years. Are we going to be able to do it under PC5 rules?
14. Throughout all of the PC5 meetings that were held, ECan always indicated to us that we would not have to go through another consenting process. I always asked the question at every meeting to make sure that those of us that have NDA's in our consent will be get to keep them. I was always told yes, and that those NDA's had been taken into account when they worked out the nitrogen load for Ahuriri Catchment. We took their word for it - perhaps we should have asked for it in writing!
15. Therefore, I am disappointed that the plan hasn't allowed for this, and is placing even more consenting burdens on us when there is absolutely no need for that. All consent holders that had to go through 2009 hearing process have extremely detailed consent conditions - there is just no need another consent.
16. ECan should focus on bringing the consent holders who are not subject to the same condition's into line with us!

OMARAMA STREAM

17. Our consent conditions include water quality monitoring conditions that have associated environment and early warning trigger levels on the Omarama Stream. These trigger levels were set during the hearing process and based on water quality standards from the Natural Resources Regional Plan.
18. Plan Change 5 has set water quality limits for Omarama Stream which are different than the limits we are subject to on our consent. I want to ensure that there is consistency between the plan and consented limits, otherwise, there is an equity issue.
19. Unfortunately, the water quality limits on Omarama Stream is the only consent condition we have been unable to comply with. ECan has granted us a waiver on this condition for one year. The Omarama Stream Users Group, which was formed in 2013, has constantly asked ECan for help with this, however nothing has happened yet. Our latest hope is that the Upper Waitaki Zone Committee has chosen Omarama Stream for a pilot program to look at water quality.
20. The inconsistency is incredibly frustrating for us, but so is not being able to comply! Basically, a blanket approach was used to set N and P levels for the Omarama Stream, and not actual water quality data. We have done, and continue to do, everything possible to work toward fencing off all our waterways with adequate riparian strips, installing culverts and have just fenced off an area for an ECan project to protect 'Bignose Galaxis'. Therefore, even though we are not meeting our consent conditions, we are continually trying to improve water quality.

CONCLUSION

21. After taking 13 years to obtain a water consent renewal and huge financial costs to do so, do you not think we have been through enough? The 2009 hearing consents have overly comprehensive conditions, and there is certainly a clear expectation from these consent holders that PC5 would not subject them to another consenting process until their consent renewals fall due again. We do not believe that it is fair and equitable after the expense and consent process that we have endured that we are required to undergo another consent process.
22. I have read the evidence of Ms. Keri Johnston and Dr Greg Ryder and agree with the relief sought.

Wendy Parsons

Date 22 July 2016