



Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 5 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 7 to the Land and Water Regional Plan
 Environment Canterbury
 P O Box 345
 Christchurch 8140

Full Name: Phillip Stephen Bay Phone (Hm): 03 3123388
 Organisation*: _____ Phone (Wk): 033123388
* the organisation that this submission is made on behalf of
 Postal Address: 942 Steffens Rd, Phone (Cell): 0274511674
RD1, OXFORD Postcode: 7495
 Email: nanandphil.bay@gmail.com Fax: _____
 Contact name and postal address for service of person making submission (if different from 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: *PS Bay* Date: 13.08.2019
(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 my submission in a joint case with others making a similar submission at any hearing

13.8.19 *PSB*

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT FOR
PLAN CHANGE OR VARIATION

Clause 5 of Schedule 1, Resource Management Act 1991

To: The Canterbury Regional Council
ecinfo@ecan.govt.nz

Name of Submitter: Phil and Nan Bay
942 Steffens Road
Oxford 7495
nanandphil.bay@gmail.com

This is a submission on Plan Change 7 to the operative Canterbury Land and Water
Regional Plan (LWRP).

An overview of our farming interest and operation, our concerns and our relief sought is set
out below.

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

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

We would be prepared to present our submission in a joint case with others making a similar
submission at any hearing.



13 September 2019

Overview of interests in farming operation

With my wife Nan, I own and operate a 58 hectare dairy farm near Oxford, of which 52 are
an effective milking platform. I have been a farmer for 50 years.

Our farm is in Nitrate Priority Sub Area E.

Irrigation consent with WIL.

WIL shareholding

Domestic/Stock water consent with Ecan.

Cows are on this property 9-10 months of the year.

80 hectares of dry land is leased in Nitrate Priority Sub Area A where we Winter graze, run
young stock, grow baleage, hay and 12 hectares of kale on a yearly rotational system.

GMP Loss Rate for 2013 is not known, 2017-2018 was 64.

We purchased this farm on 01/06/2018, believing the farm was being effectively managed
prior to purchase.

Since purchasing the property we have reduced stock numbers.

Stocking rate was 3, now 2.7 tops.

When we purchased the original property we onsold 60 hectares.

This in turn enabled us to reduce the amount of effluent dispersed onto the property via effluent system by over 50%.

We have eradicated noxious weeds from all our water races..

We irrigate By K Line from the WIL Irrigation Scheme.

We have invested in moisture probes through WIL and all water use is measured and recorded through Regan on behalf of WIL.

We have also invested in new technology to monitor cow health and wellbeing.

We have children and grandchildren that live in the Waimakariri District and the wider Canterbury Area so we believe an environmentally sustainable farming environment is essential.

Reasons for my submission

We believe that Plan Change 7

1. Will reduce our Income resulting in:-

- Laying off of staff
- Reduce our land value, which has already been reduced by the proposals put forward by Plan Change 7
- Decreased Total Equity, decreasing the amount of money we can spend in our local community which will affect local businesses
- Will reduce our production
- Will reduce our ability to sell the farm as a viable economic unit
- Will reduce our level of investment in new technology on farm

Plan Change 7 has already and will continue to have an impact on

- Farmers, Farmworkers and their families, mental and emotional wellbeing, Resulting in higher suicide rates, depression, sick days, family violence and the breakup of family units
- A mistrust of anything official
- Local businesses are already struggling with decreased business and laying off of staff as farmers tighten their fiscal spending
- Increase in farm, local business and personal bankruptcy
- An increase in Carbon Footprint as locals who have lost local employment drive in and out to the city each day for work
- A drop in the value of residential house values in Oxford township and surrounding areas
- Loss of young people to the cities due to lack of employment prospects
- Closure of local businesses
- Less spending on animal welfare due to less income

We feel that we are unable to drop our nitrate levels any lower as this would make the farm unviable.

We feel that it is unfair that someone with a low nitrate loss has to reduce theirs when other farmers with a much higher nitrate loss are going to be treated on a percentage basis of the same amount.

Farmers compliance costs are rising all the time, we feel that this plan will put the younger farmers out of business.

We would also like Ecan to explain their reasoning for the timing of the dates for Plan Change 7 submissions. As it appears to have been premeditated and deliberately timed for the busiest and most stressful time of the year for farmers.

We would like Ecan to address how they will compensate farmers who have purchased farms in good faith and are now likely to face huge financial costs, financial losses and possible bankruptcy due to their Plan Changes.

What I Am Requesting

(1) The specific provisions of the proposed plan that my submission relates to	(2) My submission is that.		(3) I seek the following decisions from Environment Canterbury
	Oppose/Support	Reasons	
Policy 8.4.25 – 8.4.29 Rules 8.5.21 – 8.5.29 Tables 8-9 (Nutrient Management Provisions)	Oppose	The starting point for reductions is unclear. Baseline GMP Loss Rate in itself may require significant reductions over my existing farming operation. The reductions set out in Table 8-9 are not achievable and will have severe implications for farming. The focus of Table 8-9 on requiring reductions on farming alone is also not consistent with the wider community all working towards maintaining or improving water quality.	Ensure the provisions and reduction regime takes into account the significant reductions that may be required even to reach Baseline GMP Loss Rate (or alternatively, delete the references to “Baseline GMP Loss Rate” and replace with “Good Management Practice”). Delete the requirement for reductions in Table 8-9 after 1 January 2030 (or 1 January 2040 if it can be demonstrated as a part of any hearing process that the extent of reductions required is achievable and reasonable). Table 8-9 should also not differentiate between areas. Include a new policy that (consistent with Hinds Plains) anticipates the community working towards an overall groundwater concentration of 6.9mg/L.
Policies 8.4.19 -8.4.21 Rules 8.5.18 -8.5.20 (Targeted Stream Augmentation)	Support	Enabling Targeted Stream Augmentation is an essential part of ensuring environmental outcomes are met (and allowing farming to continue)	
Policies 4.99 – 4.100 Rules 5.191 – 5.193 (plus schedule 32) (Managed Aquifer Recharge)	Support	Enabling Managed Aquifer Recharge is an essential part of ensuring environmental outcomes are met (and allowing farming to continue)	
Policy 8.4.25 (Monitoring and Review)	Support	Future monitoring to inform more robust decision making processes in the future is essential.	
Waimakariri section 8 including definitions of <i>Nitrate Priority Sub-area</i> and planning maps	Oppose	Consistent with the changes sought in respect of Table 8-9, the planning maps and wider section 8 should not differentiate between areas. For the life of this plan any reductions should be applied equally.	Delete sub-areas from Section 8 and associated planning maps.

BB

13-8-19