

My name is David Bullmore and with my wife Melissa farm at St Patricks, North of the state highway.

The property comprises 440 ha and has the upper Wiamea Stream passing through its western end and a series of minor water courses contributing to the flow of the Waimea.

It sits midway between the ES stream sample sites W1 and W3 and has an ES Surface Water Bore E44/0035 adjacent and downstream of our boundary.

It has been designated as having 4 Physiographic zones.

In Principle, we support the concept of reducing nutrient and chemical inputs and maintaining low discharges to air, land and water.

We aim to have our family grow up in a safe rural environment.

TO THIS END I need to say that some of my initial concerns prompting my submission in July 2016 have been resolved after reviewing the 42A Tracked report outlining Additional recommendations and deletions.

If these are adopted as “official” it will greatly assist the implementation of the amended Plan.

COMMENTARY ON MY SUBMISSION.

PHSYOGRAPHIC ZONES

I believe these are a good first assessment but not yet precise enough to allow for their use as a legal and binding document.

Could they be set up similarly to acts of Parliament i.e. as accompanying regulations empowered by the Plan.

Give us the ability to have zones which we believe to be incorrect as in our case re assessed.

This would allow easy changes as required by future research without re-litigating the main principles of the plan each time discoveries are made.

Treat them as a developing and improving entity for achieving best practice concepts and Environmental management plans.

RULE 13 TILE DRAINS

The amendment to only identify outlets of existing networks is a good compromise.

Some leniency need in certain extenuating circumstance's

RULE 14 FERTILISER APPLICATION

Another good amendment.

RULE 20 AND 23.

The amendments now clarify the requirements and make them easier to implement.

However.

These rules do have an impact on the Farm Environmental Management Plan.

It would seem that No Nutrient Budget is required in section 4 of appendix N where there is less than 20 ha of intensive winter grazing.

Does clause 2 contradict this by requiring a Nutrient Budget every 3 years?

My other comment in relation to zones and apparent risk associated with intensive cropping is as follows.

The history of this farm is to grow around 25 to 35ha of winter crop every year without any evidence of significant ground water effects.

I refer to the Environment Southland Technical reports on Ground Water Quality showing recent history for our area from 2002 to 2010 as being low

and well below the MAV for Nitrate Nitrogen for that period. This chart covers Surface water bore samples.

The stream samples are also low.

Where this evidence base exists, what allowances can be built into the system for medium to large landholdings to be given a dispensational reward of an extra 5-10 ha of winter crop as a recognition of “Good Behaviors” and waive the Nutrient Budget in favor of Best Practice Planning.

Some clarification required around the distance from fenced off waterways also if we can prove a low or nil risk of discharge in situations over nine degrees.

conclusion

Thank you for your time.