

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission - Harry Meijer on behalf of Silvacreast Farms Ltd
Date: Friday, 13 September 2019 9:49:19 AM

Dear Sir/Madam

Please find attached a Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan in respect of our client Harry Meijer on behalf of Silvacreast Farms Ltd.

Regards

Grant Edmundson

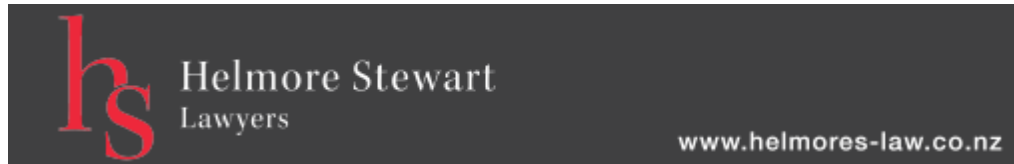
Partner

Email: grant@helses-law.co.nz

Helmore Stewart Lawyers

9 Good Street, P O Box 44, Rangiora, North Canterbury, New Zealand, 7440

T +64 3 311 8008 | F +64 3 311 8011 www.helses-law.co.nz



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

FOR OFFICE USE ONLY

Submitter ID:

File No:

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
PO Box 345
Christchurch 8140

Full Name: Harry Meijer

Phone (Hm): 03 312 1617

Organisation*: Silvacrest Farms Limited

* the organisation that this submission is made on behalf of

Phone (Wk):

Postal Address: 163 Wrights Road, Oxford

Phone (Cell): 027 476 1867

Postcode: 7495

Email: hmeijer@xtra.co.nz

Fax: N/A

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 completion 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: 12 Sept. 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 address 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 other making a similar submission at any hearing

Schedule 1

Submission in regards to Plan Change 7 to the Canterbury Land and Water Regional Plan

This submission has been prepared and is submitted by me, Harry Meijer in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am a Director of the above enterprise and I am duly authorised to make this submission.

1. Address: Wrights Road, Oxford, Waimakariri District, Canterbury
- Land Size: 620 hectares
- Land Use: This is a dairy unit within the sub-area A of the Nitrate Priority Area. The farm stocks 800 cows and also has arable, beef, bulls and support blocks. This is a combined enterprise.

Reasons for Submission

- A. I consider that we are good managers of our land. We care and upskill ourselves to have an improved understanding of our environmental effects so that we are able to make fact based decisions. We consider that we do follow good management practice and over the last decade we have voluntarily reduced our nitrogen input. A healthy soil is critical to us. And, as like many farmers, we are always prepared to look outside the square in terms of the environment and to investigate new ideas.

Submission

It is submitted:

1. Submission 1

We understand that Waimakariri Irrigation Limited and Next Generation Farmers Group have made submissions. We fully support their submissions and the outcomes sought.

2. Submission 2: Policy 8.4.25 – 8.4.29 and Rules 8.5.21 – 8.5.29 (Table 8-9)

- 2.1. Oppose. The Plan Change 7 fails to take into account historic progressive strides farmers have taken to improve their environmental footprint. On our own farm, practices include effluent storage that is greater than that which is required, and spreading over a greater area. We have three soil moisture metres, we use the Regen irrigation scheduling programme, Land-care Research is doing work on farm. Our Farm Environment Plan (FEP) includes the appropriate management of wet weather and winter grazing. Our latest FEP audit graded us comfortably a B and our Overseer nitrogen loss is below the area average for that of similar farming practices. We believe it is wrong to be penalised further when we have already invested a substantial amount towards our nitrate reduction.

- 2.2. I do not believe that GMP is clearly defined.

- 2.3 For nitrogen loss a percentage drop across the board does not recognise those that have a lower figure or have already actively put measures in place to reduce it. I acknowledge that there are environmental issues that farming has responsibility for. As farmers, we are prepared to make change for the benefit of the wider community. The changes must be fact based, not based on a predictive model as is currently. Farming must remain profitable to remain viable in the community.

2.4 We recommend to delete the requirement for reductions in Table 8-9 after 1 January 2030 and until such time that science can accurately determine the extent of the reductions required post 1 January 2030.

3. Submission 3: Section 8.5.24

- 3.1. Oppose. Limiting winter crops to 5% of the total enterprise area will inherently intensify cropping and soil damage. I do not see this as a benefit. Additionally, a regulated reduced winter crop area will cause the need for more supplements to be made, and fed in winter because less green feed is available. For some farming operations this is not a viable option and feeding those supplements can have a net effect similar to that of winter crop. Any nitrogen losses should be accounted for by Overseer.

Economic and Financial Implications

- A. The financial impact of Plan Change 7 will have a detrimental effect on our farming operation, and I stress the need to be able to continue to run a viable business.
- B. The farm plays a huge role in the Waimakariri community. In our 16 years within the community, we have hosted numerous school class visits. We are actively involved in dairy discussion groups where seasonal management topics and greater area industry issues are discussed and assessed. We have a number of staff. We support multiple local businesses and believe that it is important to continue to do so in order to keep our communities thriving. Without such farming operations, the local businesses, sports teams, social clubs and schools may also no longer be viable.

Concluding Remarks

1. Given this, the plan needs to place significant emphasis on undertaking a comprehensive zone monitoring programme for the next 10 years to ensure the science is well-informed in future plan changes – the farmers, WIL and the primary sectors are all committed to this.

Thank you for considering this submission.

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|---|--|---|------------------------------|--|
| (1) The specific provisions of the Proposed Plan that my submission relates to are: | | (2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views) | | (3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns) |
| Section & Page Number | Sub-section / Point | Oppose / Support (in part or full) | Reasons | |
| | | Support | See Schedule 1, submission 1 | |
| | Policy 8.4.25 to 8.4.29 and Rules 8.5.21 to 8.5.29 | Oppose | See Schedule 1, submission 2 | Amend as per submission |
| | Rule 8.5.24 | Oppose | See Schedule 1, submission 3 | Amend as per submission |

Add further pages as required - please initial any additional pages