

**From:** [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [dave.roseclark@gmail.com](mailto:dave.roseclark@gmail.com)  
**Subject:** Plan Change 7 to the LWRP Submission - DR & RE Clark on behalf of Wani Grange Limited and Swanlea Fields Limited  
**Date:** Friday, 13 September 2019 12:18:52 PM

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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 DR & RE Clark on behalf of Wani Grange Limited and Swanlea Fields Limited.

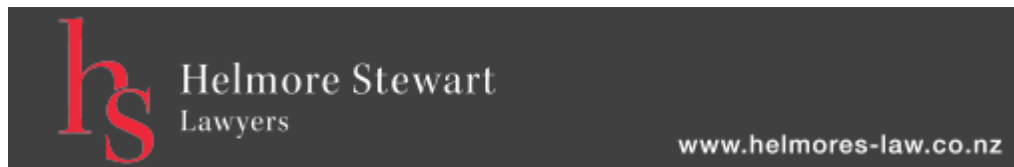
Regards

**Grant Edmundson**

Partner

Email: [grant@helses-law.co.nz](mailto:grant@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:** DR & RE Clark

**Phone (Hm):** 312 5762

**Organisation\*:** DR & RE Clark, Wani Grange Limited and Swanlea Fields Limited

**Phone (Wk):** N/A

**Postal Address:** 710 Woodfields Road, RD 5 Rangiora

**Phone (Cell):** 027 677 7702

**Postcode:** 7475

**Email:** [dave.roseclark@gmail.com](mailto:dave.roseclark@gmail.com)

**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:**

*D R Clark* *R Clark*

**Date:**

*13/9/2019*

(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 us, Dave and Rosie Clark in respect of Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. We are duly authorised to make this submission.

1. **Address:** 710 Woodfields Road, RD 5, Rangiora, Waimakariri District, Canterbury
- Land Size: 153 hectares
- Land Use: Predominately sheep and beef finishing with 30 hectares of crop / grain pasture. The property sits within sub-area E, the "purple" zone.
- Irrigation: The property is irrigated via Waimakariri Irrigation Limited which waters 100 hectares.

### Reasons for Submission

- A. We are the fifth generation descendants from Rangiora where the family still has a property. The farm was purchased in 1981 as a sheep and cropping operation. We intend for the property to remain within the family through succession planning. We have two children and our son intends to take over the family farm. Our submission is designed to support our son and daughter-in-law and help protect their future within the farming sector.
- B. On-farm improvements include three completed Farm Environment Plans with a current "B" audit.
- C. We have upgraded to a centre pivot on 28 hectares of land and have a Briggs Rotor Rainer system on the house block covering 80 hectares with some lateral and k-line systems to cover corners and hard to reach places. Soils are regularly tested when planning our crop rotations and we apply recommended fertiliser mixes.

### Submission

It is submitted:

1. **Submission 1**
- 1.1. We support the Waimakariri Irrigation Limited submission in regards to the Plan.
2. **Submission 2 – Policy 8.4.25-8.4.29 and Rules 8.5.21-8.5.29 (Table 8-9)**  
**OPPOSE**
- 2.1. The reductions as set out in Table 8-9 are not achievable and will have severe financial implications for our property in the purple nitrate sub-area. The focus of Table 8-9 is not consistent with the combined community working towards maintaining or improving water quality.
3. **Submission 3**
- 3.1. The reductions regime fails to take into account the unknown starting point. There is no clear direction as to what is needed to achieve GMP.
- Suggestion: delete the requirement for reductions in Table 8-9 after 1 January 2030. If each individual farm can demonstrate that the extent of the reductions required is achievable and reasonable to lower the areas nitrate diffusion further, we suggest one zone should encompass the area within one set of reductions that are certain achievable, irreversible and sustainable for farming operations in the future.

4. **Submission 4 – Policy 8.4.35**  
**SUPPORT**

- 4.1. Future scientific testing and monitoring will ensure a more robust decision when making processes in the future. A review of the Plan change should occur in 2030 to allow the farming operations to test the change in nature extent and scope of nitrate diffusing on-farm. There would be no need for further reductions past 2030. Farming has significantly changed since we began. More efficient measures are being adopted by science and new improved machinery has been designed to help provide food sustainability for future generations. It is unknown what the next 10 years may hold.

5. **Submission 5 – Waimakariri Section 8 including definitions of Nitrate Priority Sub-Area & Planning Maps**  
**OPPOSE**

- 5.1. Oppose. As per the changes sought in the above submissions in respect of Table 8-9, the Waimakariri area should be encompassed by one zone. We suggest deleting the sub-areas from Section 8 and associated planning maps.

**Concluding Remarks**

- A. The District Plan needs to be focused on a “measured science” rather than “methodology” and allow for plan review cycles in order to correctly and adequately correlate the data comprised from testing nitrate reductions. We are conscious of our footprint. We do our best to minimise it. Please help us help the environment without causing our farming operation to become unviable. Please allow science to develop strategies without having huge job/social implications to the district we have contributed to, and the community we want future generations to be involved in. Please allow science to develop strategies without having job / social implications to the district we have contributed to and the community we want future generations to be involved in.

Thank you for considering this submission.

<b>(1)</b> The specific provisions of the Proposed Plan that my submission relates to are:		<b>(2)</b> My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		<b>(3)</b> I seek the following decisions from Environment Canterbury: <i>(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)</i>
Section & Page Number	Sub-section / Point	Oppose / Support (in part or full)	Reasons	
	Policy 8.4.25 – 8.4.29 & Rules 8.5.21 – 8.5.29 (Table 8-9)	Oppose	See Schedule 1, submission 1, 2, 3 and 5	
	Policy 8.4.35	Support	See Schedule 1, submission 4	

**Add further pages as required - please initial any additional pages**