

**From:** [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [thedownsfarm@gmail.com](mailto:thedownsfarm@gmail.com)  
**Subject:** Plan Change 7 to the LWRP Submission - Callum Gillespie on behalf of The Downs Pastures Limited and The Gillespie Family Trust  
**Date:** Friday, 13 September 2019 10:07:04 AM

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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 Callum Gillespie on behalf of The Downs Pastures Limited and The Gillespie Family Trust.

Regards

**Grant Edmundson**

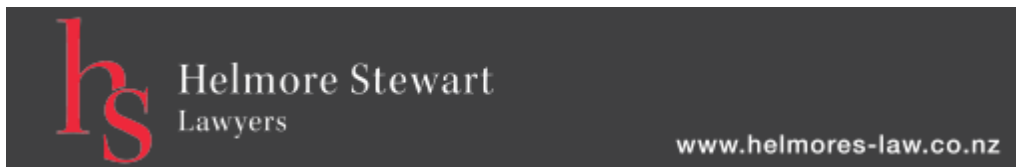
Partner

Email: [grant@helses-law.co.nz](mailto: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](http://www.helses-law.co.nz)



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

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: Callum Gillespie

Phone (Hm): N/A

Organisation\*: The Downs Pastures Limited and The Gillespie Family Trust  
\* the organisation that this submission is made on behalf of

Phone (Wk): N/A

Postal Address: 2136 Oxford Road, RD 1, Oxford

Phone (Cell): 021 937 739

Postcode: 7495

Email: [thedownsfarm@gmail.com](mailto:thedownsfarm@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: Callum Gillespie

Date: 12/09/19

(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

3.6. We oppose having enforced reductions when we believe we are already great caretakers of the land.

## Submission

4. It is submitted:

### Submission 1

4.1. We support the submission by Waimakariri Irrigation in respect of the Plan.

### Submission 2

4.2. We oppose the policies in the Plan that are based on a model and not measured data. We believe that model data will not be relevant and cannot adequately show or present our nitrate diffusion changes. We have a concern that Overseer and Farm Portal are unable to effectively reflect our farm system which is providing us with incorrect and inadequate data to generate our GM fee portal number. These programmes will need time for technology to advance so they can accurately reflect our farm and the nitration losses. We believe that setting 15% reductions for the next 10 years and then re-evaluating the measured data will give all a better picture of what is happening with the nitrate losses and inform the next appropriate steps.

### Submission 3

4.3. We oppose the winter grazing threshold being reduced to 5% (as opposed to 10%) and believe this will financially constrain our operation.

## Concluding Remarks

5. Enforcing all farms to be farming within good management practices is of great benefit to everyone. We believe no farmer wants to be responsible for harming the environment, however if it is no longer financially viable to farm our land, we will also be unable to afford to improve the environment.
6. Clean drinking water and lower nitrate levels is the ultimate goal and with all farms in urban areas doing their part, this can be achieved. However, it is not just farmers who also need to be a part of the change – lifestyle blocks and urban areas also need to play their part.
7. Future monitoring is required to make more robust decisions in order to accurately test our nitrate diffusion.

Thank you for considering this submission.

