

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission - Darcy Bishop on behalf of Bishop Farms Oxford Ltd
Date: Friday, 13 September 2019 9:44:32 AM
Attachments: [image001.png](#)
[GKE-136318-33-140-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan Darcy Bishop Bishopo.pdf](#)

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 Darcy Bishop on behalf of Bishop Farms Oxford Ltd.

Regards

Grant Edmundson

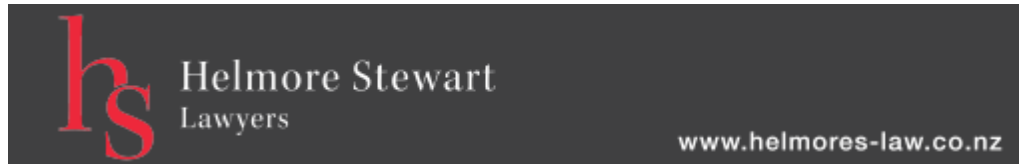
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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No:

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
PO Box 345
Christchurch 8140

Full Name: Darcy Bishop

Phone (Hm): N/A

Organisation*: Bishop Farms Oxford Limited

Phone (Wk): N/A

* the organisation that this submission is made on behalf of

Postal Address: 284 German Road, RD 1, Oxford

Phone (Cell): 027 495 5034

Postcode: 7495

Email: oxford@bishopfarms.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: Darcy Bishop

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

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, Darcy Bishop on behalf of Bishop Farms Oxford Limited in respect of Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am duly authorised to make this submission. The Company owns the following enterprise.

1. **Address:** 284 German Road, Waimakariri District, Canterbury
- Land Size:** 285 hectares
- Land Use:** This is a dairy enterprise within the Nitrate Priority Sub-Area E. The farm stocks 930 dairy cows and farms a "System 4" Production System.
- Irrigation:** The farm is irrigated via the Waimakariri Irrigation Limited Scheme. It is watered via 9 central pivots and sprinklers located in corners. The block includes a 10 hectare (300,000 cumecs) water storage pond.

Reasons for Submission

- A. Bishop Farms Oxford Limited purchased the property 6 years ago. We employ 3 staff members and winter graze our dairy cows on 2 local farms.
- B. My family's children attend Cust Pre-school and Primary School and our employees children attend Oxford Area School and their wives work in the local aged care facility.
- C. We support all local businesses and we use local rural service providers.

Submission

1. My submissions are as follows:

1.1. Submission 1 (Section 8.7.3: Table 8-9)

We oppose the modelled reductions as outlined in Table 8 and Table 9 and instead request that our on-farm nitrate diffusions are measured presently and again 1 January 2030 and the reductions in Table 8 and Table 9 re-evaluated at this time. This is to allow farming systems to apply and understand new farming technologies and to allow science to determine the nature, scope and extent of the nitrogen diffusion and how the changes over the last 10 years have adjusted the nitrate diffusing rates.

1.2. Submission 2 (Table 8-9)

We support the 15% reduction to 1 January 2030. However, we ask that these reductions take into account the historic environmental upgrades that have occurred on farm. Since purchasing the property, we have completed irrigation and effluent system upgrades and incorporated soil and moisture probe monitoring systems into our on-farm irrigation assessment. These improvements have cost us \$1 million.

The projected changes beyond 2030 in its proposed form will have major unsustainable economic implications on us because we will not be able to farm without major capital expenditure and farming practice changes. It is anticipated that the proposed changes will have major repercussions on our land values, impacting on our equity position (from a banking point of view) and may result in bankruptcy where nitrate reductions are required beyond 2030. We stress that the changes made historically and the intended steps to meet GMP with the further reduction of 15% by 2030 should be

scientifically tested in order to determine whether there is a need to further reduce our farming operation.

Economic and Financial Implications

2. We support 3 families who receive income from our farming operation. Our staff family members are heavily involved in the community and work in a local aged care facility. A reduction in our farming operation beyond 2030 will mean a significant cut in staff. This will have a knock-on effect to the community and may even erode the financial viability of businesses within the local towns. We believe we are good custodians of the land and have been working in partnership with ECan for the past 6 years. It is grossly unfair to now fundamentally change the regime now being proposed by the Plan without a more studied approach to nitrate reductions.

Concluding Remarks

3. It is essential that the Plan moves from a "methodology" to a "measured science" basis for determining the appropriate nitrate management process.
4. As all farmers in the district appreciate, I believe we have a role to play in promoting what's best for the environment. However, these changes need to be sustainable and supported via science and technology. Accurate data will inform the district and specific nitrate areas as to whether they are meeting the projected targets and the further need for reduction.

Thank you for considering this submission.

(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	
95	8.7.3 Catchment Water Quality Limits	Oppose	See paragraphs 1.1 and 1.2 Table 8-9 nitrate priority area staged reductions	Retain reductions to 2030 as established in the table. However, remove all further reductions thereafter.