

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: gmreed@scorch.co.nz
Subject: Plan Change 7 to the LWRP Submission - Gavin Reed
Date: Friday, 13 September 2019 2:05:59 PM
Attachments: [image001.png](#)
[GKE-136318-33-191-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan Gavin Reed.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 Gavin Reed.

Regards

Grant Edmundson

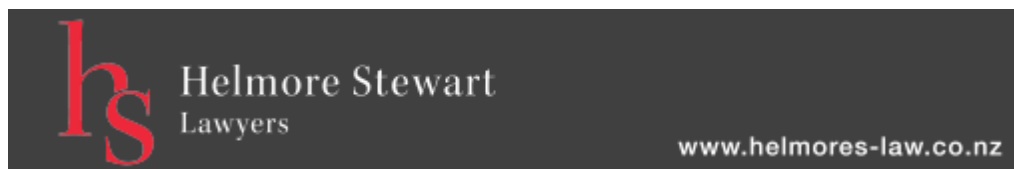
Partner

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: Gavin Reed

Phone (Hm): 033124460

Organisation*: N/A

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address: 441 Steffens Road, R.D. 6, Rangiora. Waimakariri District,
Canterbury

Phone (Cell): 027 312 4009

Postcode: 7476

Email: gpreed@scorch.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:

Gavin Reed

Date:

13/09/2019

(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, Gavin Reed in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan.

1. Address: 441 Steffens Road, Waimakariri District, Canterbury (CRC191465)

Land Use: Beef and cropping

Irrigation: See heading "Irrigation"

Reasons for Submission

- A. I have been involved with water related issues professionally and privately and have a broad spectrum of knowledge and understanding as to the challenges currently being faced (which will include a detailed perspective of the suitability of the Plan.

Submission

It is submitted:

1. Submission 1 Rule 8.4.29A and B

OPPOSE

- 1.1 Remove Table 8-9 and replace with a new rate.

2. Submission 2 – Rule 8.4.31

OPPOSE

- 2.1 Delete Rule B and replace with "exclude all farm cattle, deer and pigs from the bed of any lake, river, permanently or intermittently flowing springs or any open drain or other artificial water course while that body contains surface water which discharges into a river or lake."

3. Submission 3 – Rule 8.5.26

OPPOSE

- 3.1 Remove Table 8-9.

4. Submission 4 – Rule 8.5.22

OPPOSE

- 4.2 Remove Table 8-9 and replace.

5. Submission 5 – Rule 8-9

OPPOSE

- 5.1 delete Table 8-9 and replace with "all dairy farms within region to reduce end loss below GMP by 15% by 2030. All other livestock farms to reduce nitrogen losses below GMP by 5%. All other farms to meet GMP."

6. Submission 6 – Rule 8.5.24

SUPPORT

- 6.1 All remaining livestock farms to reduce end losses by 5% by 2030.

7. Submission 7 – Policy 8.4.35

SUPPORT

- 7.1 I believe there is a need to setup monitoring sites across the region.

8. Submission 8 – Policy 8.4.25 to 8.4.29 and Rules 8.5.21 to 8.5.29

OPPOSE

- 8.1 The reductions set out in Table 8-9 are severe and unachievable. I recommend the removal of the requirement of the reductions post 1 January 2030. A review of the available data in 2027 will signal any further reductions needed from 2030 to 2040.

Key Points

1. For me personally, meeting GMP will be challenging but achievable, except irrigation under GMP has yet to be defined. This will determine what infrastructure requirements will be needed to meet GMP.
2. By investing capital in new irrigation and stock water and replacing the fertiliser spreader with one with GPS tracking.
3. I would no longer winter cows and have changed cultivation practices to lessen nitrate losses and would retain more baleage and straw to carry stock through winter.
4. I have decreased stock winter cattle numbers and are carrying a large number of young animals. The net effect of this has been a drop in net income due to lower stock in numbers and increased capital servicing. Cost of carrying more young stock has also increased.

Cropping Operation

1. The margins from cropping can be extremely variable. Currently 45% of our farm is cropped each year. Any greater area of crop grown would cause degradation of our soil types and decrease soil organic matter and worm population.
2. Our soil Nitrogen loss is monitored and a plant analysis is completed on growing crops. The crops grown are peas, grass nitrogen seed, barley, clover, Pak Choi and radish and small seeds. Spring crops are sown to soak up excess nitrogen left in soils after winter from winter grazing crops. This reduces the need for early nitrate fertiliser applications.
3. I believe Overseer does not recognise a lot of the changes I have incorporated into my farming system so the net benefits that are shown on paper are minimal. I have few options left to make further changes to my farming operation if I want to remain economically viable.
4. All fertiliser inputs are calculated and monitored to ensure a balance of inputs verses outputs are maintained which includes factoring in grain and straw removed from the property.

Irrigation

1. I run an extremely efficient irrigation system which is monitored by using a scheduling system along with daily and weekly measuring of moisture levels within my soils under both crops and pasture. I only put on what is required by the crops to maintain a buffer within the soil profile.
2. NIWA scientists have been running a research project on my property for 8 years. Their remarks are about how little moisture escapes from my soil profile. I incorporate both moisture monitoring and weather forecast modelling to minimise losses.
3. Cropping under Overseer models won't produce further reductions beyond GMP so my only option to reduce nitrogen losses is to reduce stocking rates on my cattle grazing operation. This will reduce income and create surplus feed of some periods of the year which will have low value to sell.

Alternative Rules

1. I suggest the following alternative Rules.
 - a) All farms in the Waimakariri region to meet GMP.
 - b) All dairy farms should further reduce nitrogen losses by 15% by 2030.
 - c) The use of site specific actions to target lower stream issues such as ASM denitrification walls and the use of modelling only as a guide to highlight where further monitoring sites are required.
 - d) Encourage further development of remedies or actions which will further reduce nitrogen losses and encourage farm practices to aim for base GMP.
 - e) The permanent fencing of flood channels is excessive, only creates a build-up of weeds, tufted grasses, gorse and broom and causes channels to block up and overflow banks when in flood.
 - f) Set up a review of available data by 2027 to signal any further reductions in nitrogen losses needed from 2030 to 2040.
 - g) Nitrogen modelling losses should take into account attenuation factors.
 - h) Acceptance of site specific remedies that are having positive effects on streams.

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	
	Rule 8.4.29	Oppose	See Schedule 1, submission 1	
	Rule 8.4.31	Oppose	See Schedule 1, submission 2	
	Rule 8.5.26	Oppose	See Schedule 1, submission 3	
	Rule 8.5.22	Oppose	See Schedule 1, submission 4	
	Rule 8-9	Oppose	See Schedule 1, submission 5	
	Rule 8.5.24	Support	See Schedule 1, submission 6	
	Policy 8.4.35	Support	See Schedule 1, submission 7	
	Policy 8.4.25 to 8.4.29 and Rules 8.5.21 to 8.5.29	Oppose	See Schedule 1, submission 8	