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To: [Mailroom Mailbox](#)
Cc: ajmjcrowe@gmail.com; winterd@xtra.co.nz
Subject: Plan Change 7 to the LWRP Submission - Alan Crowe / Dave Winter
Date: Friday, 13 September 2019 10:22:53 AM
Attachments: [image001.png](#)
[GKE-136318-33-163-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan Alan Crowe and Dave .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 clients Alan Crowe and Dave Winter.

Regards

Grant Edmundson

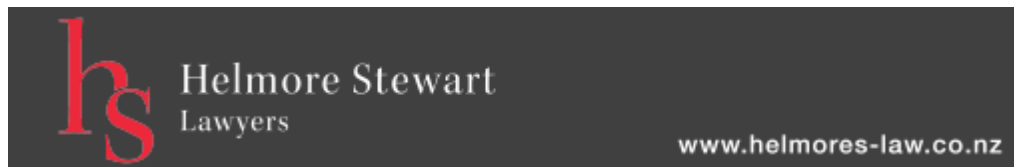
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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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: ALAN CROWE / DAVE WINTER

Phone (Hm):

Organisation*: Knightlea Ltd

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address:

Phone (Cell): 027 688 0185

1403 South Eyre Road, Swannanoa

Postcode: 7476

Email: ajmjcrowe@gmail.com winterd@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 plant 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:

AA Browe

Date:

12/9/19

(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, Alan Crowe and Dave Winter as directors of Knightlea Ltd in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am duly authorised to make this submission.

1. Address: 1403 South Eyre Road, Swannanoa, Waimakariri District, Canterbury
- Land Size: 230 hectares
- Land Use: Dairy (including winter milking) sub area "yellow".
- Irrigation: Pivots, fixed grid, 1 rotorainer and few long line sprinklers. Groundwater and WIL Water.

Submission

1. It is generally submitted:

1.1. Submission 1: Waimakariri Section 8 including definitions of the Nitrate Priority Sub-area and Associated Maps

I propose the removal of the sub-areas from section 8 and associated planning maps.

Zones areas as per plan A-E are completely undemocratic when some of the sub-area A has some of the lightest and free-draining soils of all the area which lie directly on the bank of the Waimakariri river.

1.2. Submission 2: Policy 8.4.25 – 8.4.29 and Rules 8.5.21 to 8.5.29

The Table 8-9 reductions are unachievable and will have a detrimental effect for farming. I support the 15% reduction by 2030 but recommend the removal of the requirement for reductions in Table 8-9 after 1 January 2030. Past this first 15% reduction, NZ agricultural industry would need to re-educate itself to a better understanding of what sustainable soil nutrition really means. The answer to most of the leeching and methane lies directly under our feet. Very few, including our industry scientists, seem to know or consult on soil micro-activity and understanding of the carbon nitrogen cycle. This understanding of balance soil nutrition and overuse of nitrogen leads to the destruction of hummus which is a plant available nutrient that has passed through soil microbes and converted from inorganic matter including fertiliser. When this process is more clearly understood and put into practice, there is less crude protein produced in the cow's diet that has to be excreted as surplus.

With this balance of soil nutrition and cow nutrition, the leeching becomes less. Stop picking on dairy farmers for their wrong-doing leeching nitrates. They have acted from consultation from a monopolised dairy and chemical industry who have never counted the cost of their wrong-doing.

Concluding Remarks

2. The proposed plan has immediately devalued property across the regions which now has very little alternative land use available to it on mass (the big increase in dairy developed from a financially stressed sheep industry and dairy became their alternative land use. At the present time, there is no large alternative economic land use available for such farms).
3. Industry, urban and lifestyle blocks have taken over heavier more fertile land and push intensive agriculture out to 2nd class land which is naturally less fertile with a higher water and soil nutrient requirement. I fail to see any worthwhile reliable science in this proposed sub-area plan other than political interests. From an ECan presentation about a year ago, it was suggested that the Waimakariri area would need to be growing 68% of its area in trees to mitigate leeching and omissions. This type of thinking is straight out of vandalism of the agricultural sector and financially destroying its wellbeing and the district's communities.
4. The Waimakariri is part of a hugely important food producing area of the Waimakariri plan secured by irrigation. If minimum flows and rivers and streams are expected to be reduced, water storage of surplus flow needs to take place as of now to secure what we have and supply of future dry land development. This is hugely important as part of the population benefits. A large part of the population benefits from nature's coffers. People can survive without their luxuries in life, but nothing on planet earth can survive without food and water.

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	
64	8.4.17	Oppose	The policy appears to prohibit the transfer of a water take permit to another property. This includes a groundwater take. This applies even if the allocation zone is not over-allocated. Transfer is an efficient method to re-distribute available water. Region wide policies 4.50 and 4.71 provide adequate cover.	Delete
64	8.4.18	Oppose	See above	
66	8.4.25	Oppose		
67	8.4.27	Support		
67	8.4.28B	Oppose	Circumstances define Erroneous definitions	
68	8.4.28C	Oppose	Moving target	
68	8.4.29	Oppose	Baseline GMP – broken fertiliser and irrigation proxies	
70	8.4.35	Support		
70	8.4.36	Oppose	Duration should be for a maximum in accordance with resource management. Short term durations impede long term planning.	
81		Oppose	Portal unreliability	
84	8.5.27	Support in part		Delete condition 3
Table 8.9		Support in part		Delete past 2030

Add further pages as required - please initial any additional pages