

**From:** [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [geoffsparknz@gmail.com](mailto:geoffsparknz@gmail.com)  
**Subject:** Plan Change 7 to the LWRP Submission - G R H Spark on behalf of Torlesse Farm Limited  
**Date:** Friday, 13 September 2019 10:24:40 AM  
**Attachments:** [image001.png](#)  
[GKE-136318-33-164-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan](#)  
[G R H Spark on beha.pdf](#)

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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 G R H Spark on behalf of Torlesse Farm Limited

Regards

**Grant Edmundson**

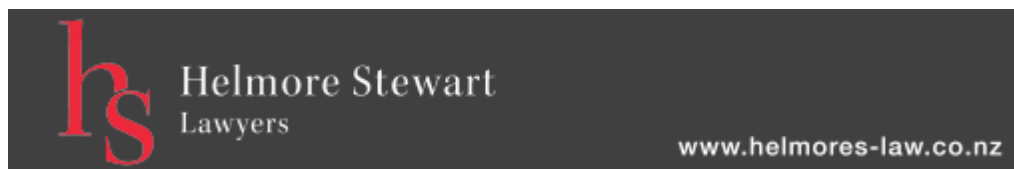
Partner

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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:** GEOFFREY ROBERT HUGH SPARK

**Phone (Hm):** \_\_\_\_\_

**Organisation\*:** TORLESSE FARM LIMITED

**Phone (Wk):** \_\_\_\_\_

\* the organisation that this submission is made on behalf of

**Postal Address:** 851 POYNTZ ROAD, R.D.6, RANGIORA 7476

**Phone (Cell):** 021 2293546

**Postcode:** 7476

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

**Fax:** \_\_\_\_\_

**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:**

*GR Spark*

**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 Geoff Spark on behalf of Torlesse Farm Limited ("Company") in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am the Director of the company and I am duly authorised to make this submission. The company owns the following enterprise:

1. Address: 851 Poyntz Road, Waimakariri District, Canterbury

Land Size: 700 hectares

Land Use: This is a combined operation consisting of 485 hectares being dairy farming and the balance being 251 hectares of dairy support. The farm stocks milks approximately 1850 cows. The property lies within both the "green zone (sub area "B")" with a small amount of "blue zone (sub area "A")".

### Reasons for Submission

- A. We need to protect the future productivity of the land and New Zealand agriculture is a world leader in the efficient production of quality agricultural produce. The world population is growing and the demand for food continues to increase. If New Zealand's ability to produce food is reduced then this opportunity is likely to be picked up by another country who is less efficient of a producer of agricultural products and from a global perspective, the global environment will be worse off.

### Submission

1. It is submitted:

#### Submission 1: Policy 8.4.25 – 8.4.29 and Rules 8.5.21 to 8.5.29 (Table 8-9)

- 1.1. Oppose. We oppose the predicted forecasting out to 2080 and believe these high reductions are unachievable. This will have a detrimental flow-on effect to the community. Farmers whose farming operations are no longer viable due to high level reductions, will be unable to sell their farm as a working operation. They may have no option but to subdivide their land into lifestyle blocks in order to maximise their return. Once farms are subdivided and houses built, the land never returns to farming and the productive ability of that land is lost.

We suggest that the requirement for reductions in Table 8-9 after 1 January 2030 is deleted.

- 1.2. We oppose the zonings in Table 8-9 and believe it is wrong to differentiate farmers with different nitrate reduction levels.

#### Submission 2: Policy 8.4.35

- 1.3. Support. We support the need for reducing nitrates and believe a practical way forward is for all farmers in all zones to reduce nitrates by 15% over the next 10 years. Following 1 January 2030, we suggest the assessment of the on-farm nitrate diffusions in order to create a more robust decision making process moving forward. Let science develop and technology advance over the next 10 years to create a guide. It is unrealistic to expect farmers to reduce past 1 January 2030 based on a model of today. We need more factual information to base such large financial decisions on.

#### Submission 3

- 1.4. I understand that Waimakariri Irrigation Limited has put forward an alternative Plan framework. I fully support their submissions.

## Economic and Financial Implications

2. We envisage the effects of this plan reaching wide outside of the farmers of whom are immediately affected. Rural support industries and businesses, local schools, contractors to name a few, will all be affected if this plan goes ahead in its current form.

It is likely farms will become unviable and farmers will be unable to support their local businesses. This negative effect will trickle down and the Waimakariri District community will suffer.

3. We believe farmers are “on board” with and supportive of reducing nitrates and we ourselves have heavily invested in farm infrastructure such as pivot irrigation, irrigation, storage dams, soil temperature monitors and moisture monitoring, irrigation scheduling and effluent storage. We have also amended our winter grazing management using catch crops after winter to “catch” nitrogen in the soil profile. Farmers will continue to invest in their farm infrastructure so long as they can see a viable and sustainable pathway moving forward. The replacement of k-lines and individual sprinklers in corners of pivots for more environmentally solid set sprinklers is an example which we predict most farmers will look to moving forward. This will significantly reduce nitrate losses but it is a significant investment that farmers will need time to digest.
4. Our philosophy in farming is long term. Most farmers are. We go by the motto “plant a tree you never see”. We have planted over 1,000 native plants around our irrigation storage lake. We want to make our farm a place that future generations will enjoy. We are also open to sharing it for public benefits and will be holding a Half Ironman/Oxman with expected 300 entries this coming December 2019. We want to bridge the rural urban divide and show that we want to connect with our urban population by opening our farm up for this planned annual event.

## Concluding Remarks

5. Given the above, the Plan needs to place significant emphasis on undertaking a comprehensive zone monitoring programme for the next 10 years to ensure the science is well represented in future plan changes – the farmers, WIL and the primary sectors are all committed to this.

Thank you for considering this submission.

