

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: parkdales@gmail.com
Subject: Plan Change 7 to the LWRP Submission - Stuart Parker on behalf of Parkdale Limited
Date: Friday, 13 September 2019 11:17:35 AM
Attachments: [image001.png](#)
[GKE-136318-33-170-1 Submission on Proposed Plan Chnge 7 to the Cant Land Water Regional Plan S Parker.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 Stuart Parker on behalf of Parkdale Limited.

Regards

Grant Edmundson

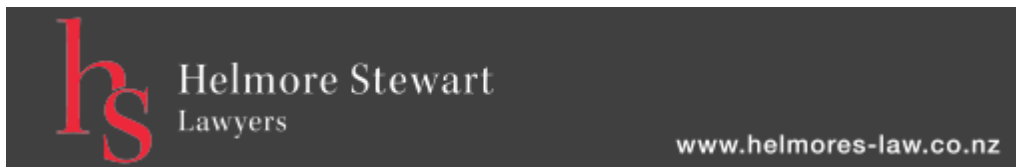
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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No:

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: Stuart Parker

Phone (Hm): 03 312 1542

Organisation*: Parkdale Limited
* the organisation that this submission is made on behalf of

Phone (Wk):

Postal Address: 225 Warren Road, RD 1, Oxford

Phone (Cell): 021 177 2278

Postcode: 7495

Email: parkdales@gmail.com

Fax: N/A

Contact name and postal address for service of person making submission (if different from above):

286 Two Chain Road, Swannanoa 7476

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: SPole

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, Stuart Parker on behalf of Parkdale Limited in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am a Director of this Company and am duly authorised to make this submission.

1. **Address:** 225 Warren Road, RD 1, Oxford, Waimakariri District, Canterbury
- Land Size: 95 hectares
- Land Use: This is a dairy unit within the sub-area A, "blue" zone.
- Irrigation: The property is watered via a 9-span pivot.

Reasons for Submission

1. We agree that everyone should do their part to improve the environment and we feel that we have invested a lot of capital on a very small scale farm to help our environmental footprint. These steps include the following:
 - 1.1. We have fully upgraded our irrigation system. We are mindful of water use and constantly monitor the weather turning off the irrigators when we get rain to save water.
 - 1.2. We have installed variable rate irrigation systems into our pivot which allows us to control exactly where the water goes and enables us to exclude areas such as lanes, silage pits, etc.
 - 1.3. We have installed and upgraded effluent control systems on-farm.

As this will indicate, we have undertaken significant investment. We are unsure moving forward how we might further reduce our nitrate loss without significant capital investments that we cannot afford outside a reduction of stock.

Submission

2. It is submitted:

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

Oppose. The reductions outlined in Table 8-9 are harsh and unachievable. We recommend the deletion of the requirement for reductions in Table 8-9 after 1 January 2030. At this date, the impacts of the previous 10 years of reductions should be measured to assess nitrate diffusion results. New technology and science may result in the 10 years of reductions reducing nitrate diffusion on-farm to an acceptable level.

2.2. Submission 2

The starting point for reductions is unclear. The baseline GMP in itself may require significant reductions over my existing farming operation. We feel the goalposts are being changed constantly and we do not feel that adequate information has been provided. Without a set baseline GMP, we are unsure what is required to meet the requested reductions. We are unable to assess the viability of our farming operation moving forward as a result.

Suggestion: a new policy that anticipates the whole community working towards an overall groundwater nitrate nitrogen concentration reduction.



It is suggested that GMP is derived from inaccurate software. We feel our whole farming future relies on a model that generates inaccurate results. It is widely known and agreed that this the case. We already have Overseer which has recognised failings. We suggest an adoption of a more reliable software programme in order to adequately assess the nitrogen losses required.

Economic and Financial Impacts

3. The financial impact of the Plan will have a detrimental effect on our farming operation.
4. Our bank have suggested to us that should the Plan as currently proposed be passed, the Bank will need to re-evaluate our farm and we may lose substantial equity. This will mean a loss of income and a loss of value for our farm which will greatly affect our retirement investment and the possible loss of our property. We are mentally stressed on our unknown future and we may no longer be able to employ our local staff member who relies on the work for her main source of income.

Concluding Remarks

5. Please be mindful of the future of farming families and communities who rely on farming to make a living.
6. Moving forward, the Plan needs to place emphasis on undertaking a comprehensive monitoring programme over the next 10 years to ensure we have accurate reliable data for future Plan changes. The community will therefore be more informed as to obligations to reduce nitrate diffusion.

Thank you for considering this submission.

