

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: graham.bain@xtra.co.nz
Subject: Plan Change 7 to the LWRP Submission - Graham Bain
Date: Friday, 13 September 2019 11:19:39 AM
Attachments: [image001.png](#)
[GKE-136318-33-171-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan Graham Bain.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 Graham Bain.

Regards

Grant Edmundson

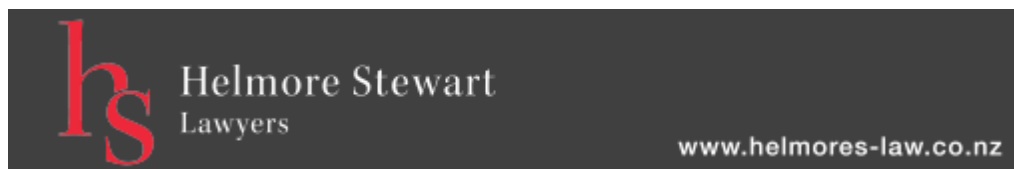
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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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: Graham Bain

Phone (Hm): N/A

Organisation*: N/A

Phone (Wk): N/A

* the organisation that this submission is made on behalf of

Postal Address: 164 Wrights Road, RD 1, Oxford

Phone (Cell): 027 232 6645

Postcode: 7475

Email: graham.bain@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 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: 

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, Graham Bain. I am a Director of five farming companies and am involved in three dairy farms here in the Waimakariri district. I am duly authorised to make this submission.

1. **Address:** Burnt Hill, Waimakariri District, Canterbury
- Land Size:** 1,400 hectares
- Land Use:** This is a combined enterprise (dairy, cropping and beef) within Sub Area A, the "light blue zone" of the Nitrate Priority Area stipulated in the Plan.

Reasons for Submission

- A. Our family has been farming in New Zealand since 1848 and I personally have been farming for 55 years and more than 25 years at Burnt Hill in the Waimakariri district. We have close family ties to the community in which we operate. There is a hundreds of people who rely on their income from our farming business.
- B. I am a worm farmer who just happens to have dairy cows, cropping and beef on top. My passion is the stewardship of the land leaving as little or no negative environment imprint and leaving the land better than when I started.
- C. My belief is that by increasing the organic matter in the soil (the Bank), it can retain what we put on top. The depth of the topsoil (the size of the Bank) has increased from about 2-3 inches in 1994 to 6 inches or more presently. My philosophy is that if you look after the soil, it looks after what is on top. By keeping the soil at the right wetness, the worms, fungi and bacteria stay alive in dry summers and doing their job. The combination of these means you get VERY low leaching. The only leaching occurring in very high rainfall events.

Submissions

- 1 My submissions are the following:

Submission 1

- 1.1. I support the Waimakariri Irrigation Limited's submission in respect of Plan Change 7.

Submission 2

- 1.2. The Plan fails to adequately take into account the starting point for the reductions regime.

Submission 3

- 1.3. The requirement for reductions in Table 8 - 9 should be suspended after 1 January 2030 to allow the science to test whether the historic reductions have varied the scope of nitrate diffusion on farm in the particular catchment areas which allegedly affect water quality in the district.

Submission 4

- 1.4. Over the next decade, there will be significant progressive strides in technology and the rollout of these technologies on farm which ought to have a drastic impact on reducing the nitrate footprints of farming operations. At this point, the science and the equivalent data is sporadic, is not well understood and has given rise to the determination of nitrate priority sub-areas which in many instances, are arbitrary and reflect an artificial construct in managing nitrate losses.

ECan Relationship

2. I personally have worked closely with ECan to improve the environment and reduce the nitrate diffusion on my property. In 2011/12, I established "Lake Ernmor", a 6 hectare irrigation lake at a cost of approximately \$500,000. The lake currently holds trout and salmon in abundance and I chose to make this capital investment at my own expense without being forced to do so by ECan. This is an indication of our intention to farm as prudently as possible and to mitigate issues relating to water quality.

Economic and Financial Implications

3. The financial impact of the above Policies and Rules will have a prejudice effect on the Waimakariri farming communities. 25 years ago, I remember the local community was dying, no buses, no library, some schools closing as rural populations decreased in the Oxford area. Through the development of farming in the area, such facilities have been able to prosper. Many of the families in the community receive an income either directly from a farming operation or through companies that support farming operations. A reduction in farming operations that are now burdened with challenges WILL mean that for some farming families, it is no longer viable to do so. There may be a knock-on effect to the community as arbitrary milestones erode the financial viability of the surrounding communities.

Concluding Remarks

4. It is essential for the district that PC7 moves away from a "methodology" to a "measured science" in respect of nitrate management.
5. I am of the view that all farmers within the district appreciate that they are caretakers of the land and in doing so, promote water quality outcomes that a community can be proud of. Reliable data needs to be ensured to adequately inform whether the community and the specific nitrate priority areas are meeting estimated targets.

Thank you for considering this submission.

