

**From:** [Kent Croote](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Friday, 13 September 2019 3:47:43 PM  
**Attachments:** [Form 5.pdf](#)  
[PC7 Submission WaterForce.pdf](#)

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Please find enclosed WaterForce Ltd submission regarding Plan Change 7

Regards  
Kent Croote

***WaterForce***

637 Halswell Junction Road  
Hornby  
Christchurch  
p 03 349 2605  
m 021 845 350  
w [www.waterforce.co.nz](http://www.waterforce.co.nz)



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

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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  
P O Box 345  
Christchurch 8140

Full Name: Kent Crouse Phone (Hm): \_\_\_\_\_  
Organisation\*: \_\_\_\_\_ Phone (Wk): 03 310 7550  
\* the organisation that this submission is made on behalf of  
Postal Address: 536 Mill Rd Phone (Cell): 021 845 350  
OHOKA RD2 Kanapoi Postcode: \_\_\_\_\_  
Email: kcrouse@waterforce.co.nz 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 competition 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: KCrouse 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 addresses 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 others making a similar submission at any hearing

## Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

### **Contact Details**

WaterForce Ltd

Ron McFetridge  
Managing Director  
021 495 925

637 Halswell Junction Rd Christchurch  
03 349 2605

530 Mill Rd Ohoka  
03 310 7550

34 JB Cullen Drive Ashburton  
03 308 4512

117 Hilton Highway, Washdyke, Timaru  
03 687 4288

*WaterForce do not wish to be heard in support of their submission*

### **Company overview**

WaterForce is a New Zealand owned and operated company with 13 branches nationwide. Over half of our staff and resources are located and operate within the Canterbury area alone. Our core business is based around agriculture & horticulture, providing water solutions and various support activities that are required. Consequently, our main client base are farmers and growers. We also provide services to domestic clients, (irrigation and pumping systems), and municipal works, operating alongside council. We have a very diverse portfolio, but with a strong and enduring agricultural and horticultural core.

Our business activities have changed significantly over the past decade as client needs and demands have evolved. We still provide new systems and service but a larger focus is now on efficiency, training and continuous improvement around efficient water management. This is mostly been driven by our client needs, but also because we (as a company) have a vision of where our industry needs to be.

We see a strong future in farm data collection and the type of technologies which allow growers to make better-informed decisions around more efficient water use, whether that be daily irrigation scheduling or longer-ranging land-use changes. Quality data is key. We continue to invest heavily in this space. For us, the ultimate goals would be to witness a lowering of environmental impacts from farming and irrigation activities, while easing the burden on growers to meet their obligations (eg: FEP audits and Overseer).

## **Our connection with the land**

Our clients and people are our business. What affects and impacts our clients has a direct influence on where we focus our efforts as a business. You cannot operate (successfully) in the agricultural and horticultural sectors these days without having a good understanding of the environmental impact of business activities. In our experience, farmers and growers are well connected with their environment and well-aware of the impacts their activities have and are continuing to have.

A significant portion of our dealings with clients is concerned with the environment and impact mitigation. It is foremost in our thinking when project managing. When you are constantly striving for workable solutions to real-life environment issues, you cannot help but develop a responsibility for the protection of the land.

Our efforts to develop and refine on-farm systems for effectively handling effluent and wastewater is hopefully testament to how seriously we address these environmental challenges. We have also been active in the following key areas;

- encouraging technology which helps farmers utilise soil moisture to better manage irrigation to reduce leaching.
- promoting initiatives to improve irrigation uniformity and efficiency.
- engaging in quality assurance programs on farms, supporting initiatives from schemes such as Waimakariri Irrigation company, Barhill Chertsey Irrigation, Acton Water, Mayfield Hinds Valletta Irrigation, Opuha Water, Central Plains Irrigation and other water user groups and individuals.

All of the above have been pursued to allow our clients to reduce their impact and allow the environment to return to a condition that is sustainable in the long term.

## **Our connection with the community**

WaterForce support a range of community organisations such as the Ohoka Domain, several Canterbury local rugby & cricket clubs, LANDSAR search and rescue and other community organisations. In addition, our staff have a diverse appreciation for the Canterbury district as keen hunters, trampers, mountain bikers, kayakers, and everything in between. Our team is proud of the work we achieve and even more so of our district and the environment based social and commercial opportunities that are available to the wider Canterbury community.

## **Concerns regarding Plan Change 7**

In general, WaterForce support the underlying objectives behind Plan Change 7. There clearly needs to be a change in farming direction if we are to meet our obligations for environmental protection, mitigation and even reverse the effects of legacy activities, and return to a state of sustainability.

Of concern to us is the proposed timelines and magnitude of the changes described. There purports to be good science behind the thresholds and levels that have been set, but as we all well know our understanding of biological and hydrological processes is constantly evolving. There appears to be a confidence issue of this modelling and science behind it in the wider agricultural community.

Scientific advancements along with farmer and community engagement, could prove to be instrumental to reducing the need to set such onerous targets beyond 2030. Our proposal is;

- In order to balance this uncertainty, there needs to be a softening of the long-term objectives (post 2030 in table 8.9).
- To compensate for the point above, we propose a rigorous review process is established to steer future determinations post 2030.

There is an important balance to be struck here between the essential need for change for the sake of restoring environmental health with the welfare and well-being of communities directly affected by these proposed changes.

### **Benefits regarding Plan Change 7**

Improved water quality is an aim/benefit for all New Zealanders. We are a country, and a district who love the outdoors. We have a district that stretches from mountains to ocean and has activities and social factors that all people in the district can make use of, that rely on or are supported by clean water. To see the continued improvements in our environment we need strong working and business environments to allow us to all access these New Zealand resources, and to allow improved investment in our region.