

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: smithenterprises@hotmail.co.nz
Subject: Plan Change 7 to the LWRP Submission - Michael Smith on behalf of Smith Enterprises Ltd and Brentworth Dairy Farm Ltd and I & M Selak Limited
Date: Friday, 13 September 2019 3:28:36 PM
Attachments: [image001.png](#)
[GKE-136318-33-209-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan Michael Smith behal.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 Michael Smith on behalf of Smith Enterprises Ltd and Brentworth Dairy Farm Ltd and I & M Selak Limited.

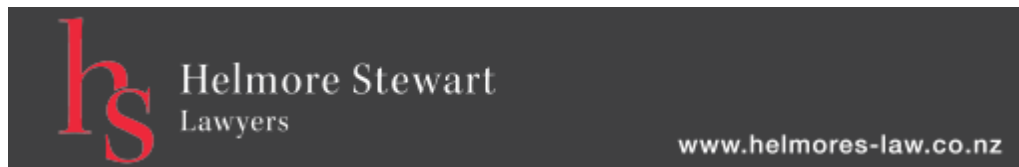
Regards

Grant Edmundson

Partner

Email: grant@helsemores-law.co.nz

Helmore Stewart Lawyers
9 Good Street, P O Box 44, Rangiora, North Canterbury, New Zealand, 7440
T +64 3 311 8008 | F +64 3 311 8011 www.helsemores-law.co.nz



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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: Michael Smith

Phone (Hm):

Organisation*: Smith Enterprises Limited and Brentworth Dairy Farm Limited and I&M Selak Limited

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address: 664 Wrights Road, Oxford

Phone (Cell): 027 500 1777

Postcode: 7495

Email: smithenterprises@hotmail.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:

Michael Smith

Date:

13/09/19

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

1 INTRODUCTION

- 1.1 I am a dairy, beef and cropping farmer.
- 1.2 My wife and I operate multiple farming properties in Oxford.
- 1.3 Since I was at school, I wanted to be a farmer. I was not born into a farming family. I knew if I wanted to own my own farm, I would have to work hard and sacrifice a lot to achieve it. I started as a farmhand and worked my way up to where I am today. Today we employ eight families in our farming business. I consider it to be my duty to teach and pass on my skill and knowledge about farming to the next generation of farmers as was passed on to me.
- 1.4 The growth of our collective business is attributable to hard work and embracing technology, best practice farming techniques, etc. These initiatives include the following:
 - 1.4.1 Irrigation systems have been upgraded to the latest technology.
 - 1.4.2 We have flow meters on our pumps and measure every drop of water deployed against the specifications of the equipment.
 - 1.4.3 We have soil moisture meters that measure soil moisture 24/7.
 - 1.4.4 We have soil temperature probes to ensure we never irrigate if the temperature is not at optimum level for pasture and crop growth.
 - 1.4.5 We soil test every single paddock every year to see what the nutrient levels are.
 - 1.4.6 We test the effluent to establish nutrient make up.
 - 1.4.7 We store our effluent until all conditions are optimal before we apply back to our pastures and crops.
 - 1.4.8 We take all the information from the soil moisture, soil temperature and soil fertility to make accurate decisions when applying fertilizer or effluent.
 - 1.4.9 We use GPS tracking on every application.
 - 1.4.10 We use satellite imagery to measure grass growth and identify different soil types on our farms.
 - 1.4.11 We use drones to check for different yields in our crops so we can apply selective fertilizer.
 - 1.4.12 We take herbage samples from our grass and crops to check we are getting our nutrient applications right.
 - 1.4.13 We have built large storage dams on our farms for when the Waimakariri River is turned off for low flow levels.

All these steps were initiated without the need for draconian regulations and policies.

2 SUBMISSIONS AND CONCERNS

Our concerns and submissions are as follows:

- 2.1 Plan Change 7 adopts a "modelled programme" which in our view, lacks definitive science, data and monitoring.
- 2.2 The sub zones of the Nitrate Priority Areas are not supported by adequate science.
- 2.3 We do not believe that nitrate reductions beyond 2030 are supported by science and adequate data.

3 CONCLUDING COMMENTS

- 3.1 We are primarily concerned with the economic effects of PC7 for the wider community area that supports the Oxford village.
- 3.2 If PC7 goes ahead (in its wholesale state), it will cripple rural communities like ours. When we came to Oxford it was a dying rural Canterbury town. With the resurgence of farming, small towns like Oxford are thriving. If PC7 goes ahead, we will suffer significant losses in our business in many forms.
- 3.3 We won't be able to employ the eight families in our business. We won't be able to support and spend money with local engineers, plumbers, mechanic, irrigation service company, seed suppliers, computer digital technology technicians, semen companies, diesel mechanic, motorbike service technicians, seed growers. Even the local rugby and netball club will be effected as well as the local fire brigade and so many more.
- 3.4 It is the family owned farms that train and breed the next generation of farmers and come up with innovations how to improve farming. It is the first time in my life that I have questioned if I want to continue farming or if I want my kids to go farming. I'm asking that decisions are based on hard robust scientific facts not assumptions and it doesn't cripple our community or our farmers. Farmers are only caretakers of the land for the future generation, it's of utmost importance to us to be sustainable.
- 3.5 We look forward to future collaborations to improve water quality outcomes.

I thank you for considering my submission.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		(3) I seek the following decisions from Environment Canterbury: <i>(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)</i>
Section & Page Number	Sub-section / Point	Oppose / support (in part or full)	Reasons	
Page 95	Table 8-9 (nutrient management of provisions)	Oppose partially	The reductions recorded in Table 8-9 are not at this point achievable and will have severe economic implications for farmers and the rural communities in which the farmers operate.	<p>Amend the reductions in Table 8-9 to only have reductions to 1 January 2030 (where percentages are supported by science and data).</p> <p>Table 8 and 9 should not differentiate between various sub-nitrate areas.</p>