

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: gusandwendy2@gmail.com
Subject: Plan Change 7 to the LWRP Submission - G and W Mehrtens - AMENDED - previously difficult to read
Date: Friday, 13 September 2019 4:21:20 PM
Attachments: [image001.png](#)
[GKE-136318-33-214-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan G W Mehrtens ame.pdf](#)

Dear Sir/Madam

Please find attached AMENDED Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan in respect of our client Graeme and Wendy Mehrtens – this supersedes the previous email/submission as it was difficult to read.

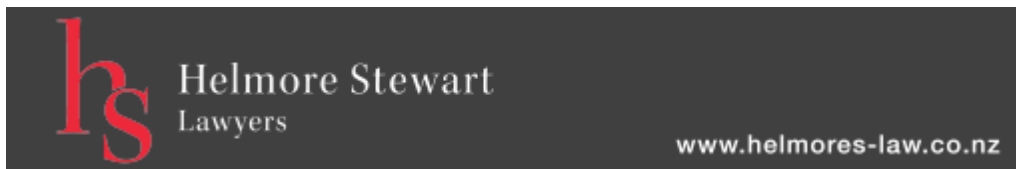
Regards

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: Graeme and Wendy Mehrtens

Phone (Hm):

Organisation*: Graeme and Wendy Mehrtens

Phone (Wk):

Postal Address: 1953 Carleton Road Oxford ,

Phone (Cell): 0212053385

Postcode:

Email: gusandwendy2@gmail.com

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 plant 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 us, Gus and Wendy Mehrtens in respect of the Plan Change 7 ("plan") to the Canterbury Land and Water Regional Plan. We are duly authorised to make this submission.

1. Address: 1953 Carleton Road , Oxford

Land Size: 36 hectares

Land Use: Other , Dairy Support

Irrigation: The block is irrigated with WIL water scheme

2. Agricultural Contractor

I Contract myself to Oxford Ag Contracting part time throughout the year, and in a more fulltime position during peak periods. Within contracting myself I use my own equipment and are specialised in Mowing, Trucking and Digger operation.

Reasons for Submission

- A. Our family has been farming in the district since 1800 and we have close family ties to the community in which we operate. Our first farm in the Waimakariri was purchased in 1977 and the farm in Paragraph 1 was purchase in 2005.
- B. We have children and grandchildren that live in the Waimakariri District, that should have the opportunity in the future to choose to have a career in farming or related industries and live in a thriving and stable community for future generations.
- C. The collective value of the land holding, buildings and contracting operations come with long term investments. We have always invested in building equipment, soil quality and with focus on animal welfare.

Particulars of Request and Basis of Submission

1. My submissions primarily relate to concerns arising from:
 - 1.1. Policy / Section 8.4.25 – 8.4.29: Oppose
 - 1.2. Policy / Section 8.5.21 to 8.5.29: Oppose
 - 1.3. Nutrient management provisions contained and reflected in Table 8 and 9 of the Plan: Oppose
2. It is generally submitted:

Submission 1

- 2.1. Timeframes are unachievable, reductions post 2040 go beyond the point of farm sustainability. By 2030 there will be a lot more science, data collection, technology on environmental outcomes. With these developments and the review we will have a more information to make recommendations beyond 2040.

Submission 2

- 2.2. The reductions set out in Table 8 to 9 are not achievable and will have severe implications for farming in these nitrate priority sub-areas.

Submission 3

2.3 The reductions regime fails to take into account the significant reductions that may be required even to reach Baseline GMP Loss Rate. Highlight that there is much uncertainty around the starting point for nutrient reductions (GMP baseline) due to the current issues with the Farm Portal and overseer they don't align.

Submission 4

2.4 There is uncertainty around the current science due to a lack of data – I have concerns in the modelled outcomes. Due to this; there are also significant concerns with the measured versus modelled data – some areas correlate well but for a number of others they appear to be an order of magnitude out.

Submission 5

- 2.3. Ground water allocation zone / depleting ground water take. There is uncertainty in the modelling. We have general concerns with the measure data models leading to prediction of nitrates that PC7 is proposing.

Economic and Financial Implications

3. A concern if PC7 in its current state it will have an negative effect of the economy for the Waimakariri District and surrounding areas. The flow on effect could be catastrophic.
4. The family plays a large role in the Waimakariri community and is a member of the Waimakariri Irrigation Limited Scheme, Next Generation Farmers Trust, Federated Farmers, DairyNZ.
5. We are good custodians of the land for many decades working in partnership with ECan. Consequently, it is grossly unfair to now fundamentally change the regime now being proposed by the Plan without allowing a more studied, iterative approach to nitrate reductions.

(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	
	8.4.25-8.4.29	Oppose	See paragraphs 2.1 to 2.9 of this submission	Amend to take into account concerns in submissions
	8.4.36-8.4.37 (Consent, Expiry & Duration)	Oppose		
	8.5	Oppose	See paragraphs 2.1 to 2.9 of this submission	

Add further pages as required - please initial any additional pages