

**From:** [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [andrew@gilchristbrothers.co.nz](mailto:andrew@gilchristbrothers.co.nz)  
**Subject:** Plan Change 7 to the LWRP Submission - Andrew and Peter Gilchrist on behalf of Gilchrist Brothers Limited  
**Date:** Friday, 13 September 2019 4:31:52 PM  
**Attachments:** [image001.png](#)  
[GKE-136318-33-217-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan A G Gilchrist.pdf](#)

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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 Andrew and Peter Gilchrist on behalf of Gilchrist Brothers Limited.

Regards

**Grant Edmundson**

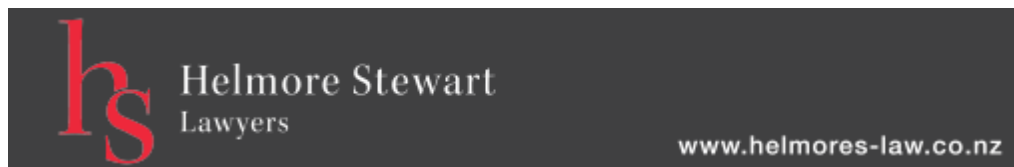
Partner

Email: [grant@helses-law.co.nz](mailto:grant@helses-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.helses-law.co.nz](http://www.helses-law.co.nz)



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

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:** Andrew Gilchrist and Peter Gilchrist

**Phone (Hm):**

**Organisation\*:** Gilchrist Brothers Limited

**Phone (Wk):** 03 312 6792

\* the organisation that this submission is made on behalf of

**Postal Address:**

**Phone (Cell):** 027 431 4224

Midhurst, Swannanoa, RD5, Rangiora

**Postcode:** 7475

**Email:** [andrew@gilchristbrothers.co.nz](mailto:andrew@gilchristbrothers.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:***

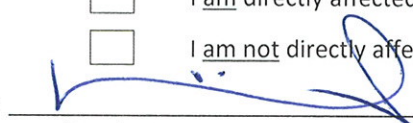
☐

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:**

13/9/19

(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 Andrew Gilchrist (and Peter Gilchrist) on behalf of Gilchrist Brothers Ltd in respect of the Plan Change 7 ("Plan") to the Canterbury Land and Water Regional Plan. I am duly authorised to make this submission.

1. Address: Midhurst, Swannanoa, RD5, Rangiora, Waimakariri District, Canterbury

#### Reasons for Submission

- A. Gilchrist Brothers Limited is a multi-tier agriculture service company involved in agri-spraying, cultivation, engineering and liquid fertiliser transport within the primary industry sector.
- B. 98% of our business arises from the Waimakariri district.
- C. We have been in business for 14 years and 80% of our contracting work arises from the dairy sector.
- D. As company, we are strong advocates for technology and science, always looking to enhance our clients' capabilities on-farm. Innovation is key and we consider the Plan in this context.

#### Submission

1. It is submitted:

##### 1.1. Submission 1

The Nitrate Priority Area unnecessarily, and without sufficient technical data to support the nitrate sub-areas, may have a drastic and unintended consequence in putting a large number of farmers into financial distress.

It is essential to balance water outcomes with a healthy primary agricultural sector. If farmers have the ability within their operations to address the requirements of the Plan, it will be because they will have sufficient time, data and science to confirm that the mitigations taken, particularly in irrigation, are having the desired effects.

Consequently, it is suggested that Table 8-9 should only provide a benchmark until 2030 at which point if rigorous data collection and monitoring has been undertaken, ECan and the farmers will be able to assess the progress that has been made in terms of nitrate diffusion.

#### Concluding Remarks

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: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)		(3) I seek the following decisions from Environment Canterbury: (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)
Section & Page Number	Sub-section / Point	Oppose / Support (in part or full)	Reasons	
	Policy 8.4.25 – 8.4.29 Rules 8.5.21 – 8.5.29 Table 8-9 (Nutrient Management Provisions)	Oppose	Ensure the provisions and reduction regime takes into account the significant reductions that may be required even to reach Baseline GMP Loss Rate (or alternatively, delete the references to "Baseline GMP Loss Rate" and replace with "Good Management Practice").  Delete the requirement for reductions in Table 8-9 after 1 January 2030 (or 1 January 2040 if it can be demonstrated as a part of any hearing process that the extent of reductions required is achievable and reasonable). Table 8-9 should also not differentiate between areas.	The starting point for reductions is unclear.  The reductions set out in Table 8-9 are not achievable and will have severe implications for farming. The focus of Table 8-9 on requiring reductions on farming alone is also not consistent with the wider community all working towards maintaining or improving water quality.

Add further pages as required - please initial any additional pages