

From: [Charlotte Glass](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Wednesday, 11 September 2019 6:06:58 PM

Please find my Submission attached.

Charlotte Glass

Director / Consultant

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

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: Charlotte Glass Phone (Hm): _____

Organisation*: Agri Magic Limited Phone (Wk): _____
* the organisation that this submission is made on behalf of

Postal Address: c/- 707 McLaughlins Rd, R D 1, Darfield Phone (Cell): 027 2704442
Postcode: 7571 _____

Email: charlotte@agrimagic.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: *Charlotte Glass* Date: 9/9/2019

(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

(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	
Section 8	Table 8-9	Oppose	It is not clear if reductions are to be calculated based on Baseline, current or future land use.	Please clarify what point in time the land use associated with reductions is to be made from. It is unclear and therefore open to interpretation.
Section 8	Table 8-9	Oppose	Dairy farms tend to have a lower nitrogen loss rate (even when winter is included) than many mixed cropping, arable or horticultural land uses yet they have been allocated a higher reduction. This will lead to perverse outcomes when farmers try to respond to National Policy relating to Green House Gases and Carbon. If the farm was a dairy unit in the Baseline seasons, and if reductions percentages are based on baseline land use, then lower N loss properties will not be able to change their land use to reduce their emissions. It locks them into being a dairy farm.	Reduction proportions should not be related to land use. Reductions should be “effects based” rather than input constrained in accordance with the intent of the RMA otherwise perverse outcomes regarding land valuation and farmers ability to respond to international markets and National Environmental Policies are constrained.
Section 8	8.5.23C	Oppose	It is known that the Portal proxies, in particular those relating to nitrogen fertiliser are non-sensical however the portal is still the key determinant of the nitrogen constraint.	Please make the limitations of the portal explicit. In particular where farmers use it to define Baseline GMP Loss Rates on their land use consents and grow crops on their properties, they should be made aware that the proxy for nitrogen fertiliser may provide them with a much lower GMP Loss Rate than they can operate to when good management practices are in place. They should be directed to the Equivalent Pathway. In addition, the Equivalent Pathway should be more clearly defined so that farmers with cropped areas (in particular) do not have to go through a full consent process before they can assess their Baseline GMP Loss Rate (particularly important when land is bought and/or sold). This is the situation under the current use of the Portal and Equivalent Pathway.
Section 2	2.9, Definitions	Oppose	Dairy land use is singled out at reduction stage however it is poorly defined in the plan. Does this include dairy animals of all species?	Define “Dairy” as it relates to reductions. Clarify how the reductions should work for mixed farming enterprises.
Section 14	Table 14(zc)	Oppose	It is not clear if reductions are to be calculated based on Baseline, current or future land use.	Please clarify what point in time the land use associated with reductions is to be made from. It is unclear and therefore open to interpretation.
Section 14	Table 14(zc)	Oppose	Dairy farms tend to have a lower nitrogen loss rate (even when winter is included) than many mixed cropping, arable or horticultural land uses yet they have been allocated a higher reduction. This will lead to perverse outcomes when farmers try to respond to National Policy relating to Green House Gases and Carbon. If the farm was a dairy unit in the Baseline seasons, and if reductions percentages are based on baseline land use, then lower N loss properties will not be able to change their land use to reduce their emissions. It locks them into being a dairy farm.	Reduction proportions should not be related to land use. Reductions should be “effects based” rather than input constrained in accordance with the intent of the RMA otherwise perverse outcomes regarding land valuation and farmers ability to respond to international markets and National Environmental Policies are constrained.

Section 14	14.5.16 & 14.5.16B & 14.5.19	Oppose	It is known that the Portal proxies, in particular those relating to nitrogen fertiliser are non-sensical however the portal is still the key determinant of the nitrogen constraint.	Please make the limitations of the portal explicit. In particular where farmers use it to define Baseline GMP Loss Rates on their land use consents and grow crops on their properties, they should be made aware that the proxy for nitrogen fertiliser may provide them with a much lower GMP Loss Rate than they can operate to when good management practices are in place. They should be directed to the Equivalent Pathway. In addition, the Equivalent Pathway should be more clearly defined so that farmers with cropped areas (in particular) do not have to go through a full consent process before they can assess their Baseline GMP Loss Rate (particularly important when land is bought and/or sold). This is the situation under the current use of the Portal and Equivalent Pathway.

Add further pages as required – please initial any additional pages.