

---

**From:** ECInfo <ecinfo@ecan.govt.nz>  
**Sent:** Thursday, 12 September 2019 7:48 AM  
**To:** Mailroom Mailbox  
**Subject:** FW: Submission on publicly notified proposal for policy statement or plan, change or variation  
EMAIL:06540017939  
**Attachments:** image001.jpg; Submisson\_Plan Change 7 \_ Glen Eyre.pdf  
**Importance:** High

Hello Team

This email came into our Customer Services email queue. Can you please workflow?

Kind regards

----- Original Message -----

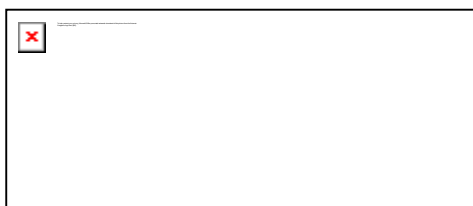
**From:** McGirr Felix  
**Received:** 11/09/2019 5:23 p.m.  
**To:** ECInfo; Mailbox Customer Services  
**Subject:** Submission on publicly notified proposal for policy statement or plan, change or variation

Good evening,

Please find attached submission on PC7.

Kind Regards,

Felix McGirr  
GM Craigmores Dairy Partnership  
Craigmores  
47 Waterloo Road, Hornby, Christchurch 8042  
P O Box 16343, Hornby, Christchurch 8441  
M +64 27 581 9722 E [felix.mcgirr@craigmores.com](mailto:felix.mcgirr@craigmores.com)  
[www.craigmores.com](http://www.craigmores.com)



The information in this email and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this message, delete any copies held on your systems and notify the sender immediately (ph 027 581 9722). You should not retain, copy or use this email for any purpose, nor disclose all or any part of its content to any other person.



SUBMISSION ON PUBLICALLY NOTIFIED PROPOSAL FOR POLICY  
STATEMENT OR PLAN, CHANGE OR VARIATION  
Clause 6 of Schedule 1, Resource Management Act 1991

The Canterbury Regional Council  
By Email: [ecinfo@ecan.govt.nz](mailto:ecinfo@ecan.govt.nz)

Glen Eyre Dairy Limited  
1062 Carleton Road Oxford  
Box 16343  
Hornby  
Christchurch 8441

This is a submission on plan change 7 to the operative Canterbury Land and Water Regional Plan.

An overview of our farming enterprise is set out below with our concerns.

We could not gain an advantage in trade competition through this submission.

We do wish to be heard in support of the submission.

We would be prepared to present in a joint case with others making a similar submission at any hearing.

Signed:

A handwritten signature in blue ink, appearing to read "Felix McGirr".

Felix McGirr  
GM Craigmore Dairy Partnership  
Craigmore  
47 Waterloo Road, Hornby, Christchurch 8042  
P O Box 16343, Hornby, Christchurch 8441  
M +64 27 581 9722 E [felix.mcgirr@craigmore.com](mailto:felix.mcgirr@craigmore.com)  
[www.craigmore.com](http://www.craigmore.com)



## Operations

Glen Eyre Dairy Limited is a 426-ha dairy unit located at 1062 Carleton Road near Oxford. The farm is entering its 8<sup>th</sup> season since it was converted from a sheep and beef finishing block. Craigmore Farming has owned the property for the past two seasons.

The farm is currently irrigated using a mixture of center pivot irrigators, k line irrigation or lateral sprinklers and solid set irrigators. A proportion of the total area remains ineffective.

During the past 2 seasons Glen Eyre Dairy have invested a substantial amount of capital towards improving Glen Eyre. Approximately \$600'000 has been invested for improving dairy effluent infrastructure and irrigation monitoring equipment to date.

Glen Eyre Dairy Limited and Craigmore Farming are committed to be a leader in environmental best practice across the country. Our core principals include; to protect and enhance animal welfare, biodiversity, soil and water.

## Our Submission

Glen Eyre Dairy Limited are afraid that Plan Change 7 does not consider the level of capital investment required and the ongoing effects this may have on our farming community.

Glen Eyre are concerned not only for our viability as a farming business but for farmers in sub areas B to E. The limitations, if imposed for Glen Eyre will be an impediment on reaching our short-term strategic targets.

The modeling work being completed today will be superseded by improved modeling. The timelines provided in table 8-9 for Area Staged Reductions in Nitrogen Loss are unrealistic. Forecasts for long term reductions any greater than 5-10 years will likely be invalid within 1-2 years as science inevitably will discover errors and omissions in the data used and new mitigations will evolve.

Glen Eyre Dairy Limited and Craigmore Farming recognise the need for continual improvement in everything we do. We believe through ongoing learning, scientific research and development, we as farmers will evolve best practice farming for the benefit of our environment, community, and our partners. We provide a safe and supportive environment for our staff and contractors where we can create rewarding career paths and futures. But for this to occur the business must remain profitable.

Plan change 7 has not considered the full universal impacts on the Canterbury region and its business which rely on farming, its young farming couples who dreamt of a career that rewards for hard work and perseverance.

## Farm Facts

- Glen Eyre Dairy has spent over \$600'000 in the last 2 seasons to improve effluent and irrigation infrastructure
- Glen Eyre Dairy spends over \$5000 per year in environmental consultancy to ensure we remain compliant and remain actively engaged on matters which affect our environment including regular monitoring and measuring of key environmental indicators such as soil fertility and consideration of our supplementary feed inputs and their effect on nutrient losses.
- Glen Eyre Dairy spends over \$5000 per year on the Regen farm information system to monitor and manage our irrigation applications
- Glen Eyre Dairy use overseer to support our strategic decision making in advance of annual budgets.
- Glen Eyre have an annual regrassing plan which includes the use of plantain in all pasture swards.

## Changes Sought

<b>Provision</b>	<b>Comment</b>	<b>Support/Oppose</b>
<b>Policy 8.4.25 -8.4.29</b>  <b>Rules 8.5.21-8.5.29</b>  <b>Table 8-9</b>  <b>(Nutrient Management Provisions)</b>	The reductions in table 8-9 are not achievable and will have catastrophic consequences for farmers. It is not supportive of a community wide initiative which works towards water quality enhancement.	Delete the requirement for reductions in Table 8-9 after January 2030.
<b>Policies 8.4-19-8.4.21</b>  <b>Rules 8.5.18-8.5.20</b>  <b>(Targeted Stream Augmentation)</b>	Enable Targeted Stream Augmentation is an important part to ensure environmental outcomes are met. (A pragmatic way to improve environmental outcomes and continue farming viably)	Support
<b>Policies 4.99-4.1.100</b>  <b>Rules 5.191-5.193 (+ Schedule 32)</b>  <b>(Managed Aquifer Recharge)</b>	Enabling Managed Aquifer Recharge is an essential part of ensuring environmental outcomes are met. (A pragmatic way to improve environmental outcomes and continue farming viably)	Support
<b>Policy 8.4.35</b>  <b>(Monitoring and Review)</b>	Future monitoring to inform more vigorous decision-making processes in the future is critical.	Support
<b>Waimakiriri section 8 including definitions of Nitrate Priority Sub-area and</b>	Consistent with the changes sought in respect of Table 8-9, the planning maps and wider	Oppose  Delete sub-areas from section

<b><i>planning maps</i></b>	section 8 should not differentiate between areas. For the life of this plan any reductions should be applied equally.	8 and associated planning maps.
-----------------------------	---	---------------------------------