

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission - Richard Taggart on behalf of Taggart Farms Limited
Date: Friday, 13 September 2019 9:42:11 AM
Attachments: [image001.png](#)
[GKE-136318-33-139-1 Submission on Proposed Change 7 to the Canterbury Land and Water Regional Plan Roscoe Taggart Tagg.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 Richard Taggart on behalf of Taggart Farms Limited.

Regards

Grant Edmundson

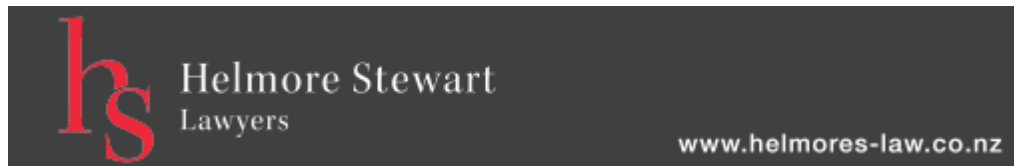
Partner

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

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: ROSCOE TAGGART

Phone (Hm):

Organisation*: Taggart Farms Partnership

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address: 2045 Oxford Road, Cust, RD 1, Oxford

Phone (Cell): 027 517 5922

Postcode: 7495

Email: roscoetaggart1@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 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:

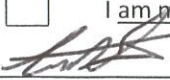
☐

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: 12-09-2019

(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 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 me, Roscoe Taggart on behalf of Taggart Farms Partnership 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:** 2045 Oxford Road, Cust, Waimakariri District, Canterbury
- Land Use:** Arable cropping, Mixed arable cropping/lamb and beef finishing.
- Irrigation:** Pivot, variable rate and Lateral irrigator, ocmis boom and 1 roto rainer.

Introduction

1. My submissions primarily relate to concerns arising from:

- 1.1. The partnership bought a dairy farm in 2013 (although it was never run as a dairy farm by ourselves) and was subsequently converted to arable cropping in 2013. This dairy farm had an ocmis gun irrigation system. We converted this irrigation system to center pivot with variable rate, coupled with stored water for maximum water use efficiency.
- 1.2. With our on-farm mitigations, our baseline figure for N loss was the following:
- (a) 2016 – 17 (N loss)
 - (b) 2017 – 44 (N loss)
 - (c) 2018 – 60 (N loss)

We have made considerable farm improvements in dealing with water efficiencies in an attempt to address our nitrate "footprint". However, as can be seen from the erratic results from the portal, it appears (wrongly) that our efforts have not generated positive results. This is not the case at all. Within this time we have reduced cattle numbers by half, introduced variable rate irrigation, upgraded to the very latest model fertiliser applicator with every single precision option available, put in water storage to be more precise with our irrigation management, installed two different brands of soil moisture probes (at any one time during the irrigation season we can have up to 40 probes in the ground across our farm.

- 1.3. The primary concern is that the fertiliser / nitrate proxy on Overseer does not provide accurate and reliable findings. This is widely acknowledged within the industry and yet the Plan persists with a model that is based on inaccurate results.
- 1.4. As an operation, we continue to implement a host of on-farm mitigations to improve our nitrate position.
- 1.5. We have changed our irrigation system from "gun" to "centre pivot" with variable rate irrigation to improve our water efficiency and nitrate diffusion. We have more targets in mind of how to make our system more efficient, but my worry is- why would I? Am I better to keep it up my sleeve and only do the bare minimum each 10 year period so I know that I can meet regulation?

Submissions

2. My submissions primarily relate to concerns arising from:

Submission 1

- 2.1. The nitrate reduction tables in Table 8 – 9 will put a host of farmers (irrespective of land use) under significant economic and financial pressure.

These farmers may be led to believe that alternative land uses may be an option. This is severely misleading. There are very limited contracts for the purchase of arable products on both a domestic and international basis. This is a significant barrier to entry and market forces have been at play for a number of years setting the established tension between “demand and supply”. A large number of dairy farmers converting to arable cropping will drive the prices of products down.

Submission 2

- 2.2. In the event a number of dairy operators go out of business as a result of PC7 (being adopted in its wholesale state), there is a real likelihood that these dairy customers who purchase products from us, (ie rye grass, clover and barley) will no longer be able to afford to purchase our product in the same volumes.

There will be an overall decline in the financial health and wellbeing of the primary industry sector within the Waimakariri district which will in turn affect the viability of the supporting urban areas, ie Rangiora, Amberley and Woodend.

Concluding Remarks

3. I support a process of adaptive management to meet the zone’s long term water quality objectives. This can only be achieved through a rigorous, comprehensive water quality monitoring programme and to that extent, I support the Plan where this policy is recorded.

Thank you for considering this submission.

X

(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	
	8.4.25 – 8.4.29	Oppose	The commencement point for reductions is unclear to many farmers. The ability to achieve baseline GMP Loss Rate may require significant reductions with existing farming operations before any further reductions are required to be achieved.	
	Table 8-9 (Nutrient Management Provisions)	Oppose	It is submitted that the reductions should only take place to 2030 and for the science and data then to be assessed in regards to the necessity for further reductions and the percentages that ought to be applied.	Amend table accordingly

Add further pages as required - please initial any additional pages