

From: [Kirsty Martin](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Friday, 13 September 2019 12:14:42 PM
Attachments: [image009.png](#)
[Form5forPC7totheLWRP \(4\) - Dairy Farm Management Services Ltd .pdf](#)

Kind regards,

Kirsty Martin



Farm Environmental Consultant | Dairy Farm Management Services Ltd

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Submitter ID:

File No:

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: Kirsty Eve Martin Phone (Hm): 03 366 5665
Organisation*: Dairy Farm Management Services Ltd Phone (Wk): 027 465 2803
* the organisation that this submission is made on behalf of
Postal Address: PO Box 37, Darfield 7541 Phone (Cell): _____
Postcode: 7541
Email: Kirsty@dfms.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:  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 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

Schedule 1 – Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Introduction

Dairy Farm Management Services (DFMS) is a rural consultancy business based in Canterbury. Our consultants provide guidance and advice to the agricultural sector. Areas of expertise that our consultants offer include farm systems and management, day to day advice, financial planning, human resources, strategic advice, nutrient management and environmental options and succession planning.

Our goal is to assist farmers in incorporating strategies that will protect their business and to build flexibility which allows for sudden changes including environmental, social and economic.

“As consultants with skin in the game, we understand the effort and passion that goes into farm systems and the strategies that make them work.”

Position of interest to Plan Change 7 of the Canterbury Land and Water Regional Plan

As a consultancy company based in Canterbury, we have a profound understanding of the environmental changes and pressures faced by dairy farmers within our region. However, we are deeply concerned about the proposed challenged that farming families and the wider community will face if these new policies and rules come into effect.

Thank you for taking into consideration our 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 Pages 66-68. Policy 14.4.17 – 14.4.28 Pages 136-139 Rule 14.5.14 – 14.5.23A Page 149 - 153		Oppose	The starting point for Baseline GMP reductions is unclear. The Environment Canterbury Farm Portal is not producing consistent results. The Baseline GMP loss rate for the purpose of regulation should be a credible number which remains consistent throughout the life of the plan. It should not be a moving target.	Until the Environment Canterbury Farm Portal is able to provide credible and reliable results, the plan should have an alternative set of GMP guidelines for the calculation of GMP which will provide consistency across all farms. For the different zones (Waimakariri and OTOP), a specific set of industry agreed GMP guidelines for farmers to input into their Overseer files to generate their Baseline GMP (2009-13) number is required. This will determine the definite starting point for farmers from which they can make the reductions required by the plan. This would be more consistent with PC1.
Table 14 (zc) Page 173		Oppose	The reductions in table 14(zc) (High Nitrogen Concentration Area Staged Reductions) will have serious financial impacts on famers in this area and will affect the viability of their businesses.	Request the ongoing monitoring and review of the surface water and ground water within the zone and longer timeframes for farmers to achieve environmental outcomes.
Table 8-9 Page 95		Oppose	The reductions set out in Table 8-9 are unachievable and will have severe financial implications for the farming families in the zone and the whole community. The focus should be on continuing measuring and monitoring and making reduction decisions at that time based on the science rather than the model.	Request to delete the requirement for reductions beyond 1 January 2040. Include a new policy that (consistent with PC1/PC2) anticipates the whole community working towards an overall groundwater nitrate-nitrogen concentration of 6.9mg/l.

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