

From: [Tracey Anstiss](#) on behalf of [Grant Edmundson](#)
To: [Mailroom Mailbox](#)
Cc: fridgy3@hotmail.com
Subject: Plan Change 7 to the LWRP Submission - Mervyn Todd on behalf of Parish Dairies / Todd Enterprises
Date: Friday, 13 September 2019 4:47:56 PM

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 Mervyn Todd on behalf of Parish Dairies / Todd Enterprises.

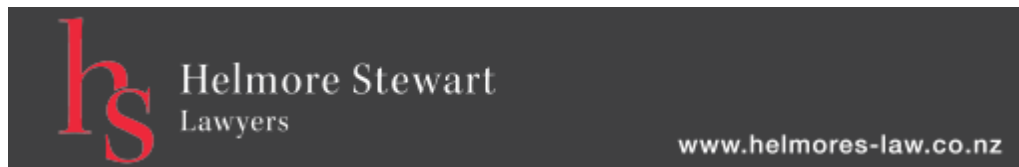
Regards

Grant Edmundson

Partner

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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: Mervyn Todd

Phone (Hm):

Organisation*: Parish Dairies / Todd Enterprises

Phone (Wk):

* the organisation that this submission is made on behalf of

Postal Address: 160 Stubbs Road, Starvation Hill, Oxford

Phone (Cell): 027 453 7111

Postcode: 7495

Email: mervyn.todd@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 plant 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 me, Mervyn Todd on behalf of Todd Enterprises and additional stakeholders (including Neale and Jennifer Todd, Todd FT and Parish Dairies – 346 Parish Road, Burnt Hill) 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:** 160 Stubbs Road, Starvation Hill, Oxford, Waimakariri District, Canterbury 7495
- Land Size:** 320 hectares
- Land Use:** This is a self-contained dairy unit (dairy platform and support block) primarily within the "red zone", Sub-Nitrate Area E.

Reasons for Submission

- A. I have been farming on the above property since 1986.
- B. I have four staff that assist on-farm.
- C. These submissions are of a general nature and are to be read in support of the submissions by Next Generation Farmers Group.
- D. It is critical for the ongoing success of farming in the district that **sustainable, irreversible progress** is made in the water quality and without detrimental effects being felt in the primary agricultural sector. This balance needs to be achieved and the first step in doing so is to recognise on-farm mitigations that have already taken place, that have been implemented by farmers at their own initiative and often, with significant expense.
- E. The Plan, for it to be effective, needs to recognise the above balance in both policy and rules. My submissions therefore should be read and considered in this regard.

Submission

Key Submission: By definition, baseline GMP is reflective of what GMP was at 2009 – 2013. It is not endorsed to change GMP once the Plan gets to 2040 because in doing so, the farmer will not be recognised or rewarded for the historical investment, technology and management initiatives implemented on-farm. This is counter-productive thinking and process.

It is further submitted:

- 1. **Submission 1 – Policy 8.4.25 to 8.4.29 and Rules 8.5.21 to 8.5.29 (Table 8-9)**
 - OPPOSE**
 - 1.1 The Table 8-9 reductions are unachievable and will have a detrimental effect on the community as a whole and suggest instead to delete the requirement for reductions in Table 8-9 post 1 January 2030 and instead bring Table 8-9 up for review. Additionally the reduction regime fails to take into account the historical reductions that farms have voluntarily completed.
 - 1.2 The reductions fail to take into account the economic and time investments that have historically been completed given the unclear starting point for reductions. The reduction requirements to meet base line GMP and further are unclear.

2. **Submission 2 – Rule 8.4.35**
SUPPORT
2.1 The reductions up until 1 January 2030 should be monitored in order to make an informed decision about the requirement of reductions post 1 January 2030.
3. **Submission 3**
SUPPORT
3.1 I understand the Next Generation Farmers Group is making a submission. I wholly support this submission.
4. **Submission 4 – Rule 8.5.24**
SUPPORT
4.1 I support the 10% winter grazing threshold as this ensures end loss associated to winter grazing is consistently managed across the zone. I oppose an amendment of this 10% threshold to 5%.
5. **Submission 5 – Waimakariri Section 8 including definitions of nitrate priorities sub-area and associated maps**
OPPOSE
5.1 I am concerned regarding a change of zoning after 2023. I suggest instead the deletion of the sub areas from section 8 and instead one zone encompassing the district. This ensures any reductions are applied equally throughout the district.
6. **Submission 6 – Policy 4.31**
SUPPORT
6.1 I support the policy that excludes livestock from water bodies.
7. **Submission 7 – Rule 8.4.36 to 8.4.37**
OPPOSE
7.1 I oppose the basis for common expiry date of all consents. It is difficult from a financial perspective to Plan when consents expire after 10 years.
8. **Submission 8 – Schedule 7**
SUPPORT
8.1 I believe the Farm Environmental Plans are a good tool to identify Plan objectives and targets for management and reductions moving forward and to record on-farm mitigations.

Concluding Remarks

Thank you for considering this submission.