

From: [Jamie Robinson](#)
To: [Mailroom Mailbox](#)
Cc: [Hans van der Wal](#); [Alan](#); [John Talbot](#); ngakuroa@xtra.co.nz
Subject: Plan Change 7 Further Submission for As One Incorporated [DC-Documents.FID2837222]
Date: Friday, 6 December 2019 3:34:23 PM

Good afternoon,

Please find **attached** the further submission on behalf of As One Incorporated (submitter number 387).

I confirm that we will serve this on all parties referenced within this further submission next week.

Kind regards,
Jamie.

Jamie Robinson
Associate

[d +64 3 372 6459](tel:+6433726459) | [p +64 3 379 2430](tel:+6433792430) | [m +64 21 376 459](tel:+6421376459)
duncancotterill.com | [View Duncan Cotterill LinkedIn](#)

Duncan Cotterill Plaza 148 Victoria Street
PO Box 5 Christchurch 8140 New Zealand

[Click here](#) for office directions



We wish all our clients a happy and safe holiday season.

All of our offices will close at **5:00pm on Monday 23 December 2019** and re-open at **8:30am on Monday 13 January 2020**.

Phone calls for all our offices will be monitored between 8:30am - 5:00pm in the week Monday 6 January to Friday 10 January.

Our partners continue to be available on mobile to assist you on urgent matters. Please [click here](#) for partner contact details.

This message may contain confidential and privileged information. If you have received this e-mail in error, please advise us by return e-mail or telephone and then delete this e-mail together with all attachments. Please visit <https://www.duncancotterill.com/emaildisclaimer> for other important information concerning this message.

Submitter ID:

File No:

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

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by **5.00pm 29 November 2019** to:

Customer Services
Environment Canterbury
P O Box 345
Christchurch 8140

or

by email to mailroom@ecan.govt.nz
with "Plan Change 7 LWRP Further Submission"
in the subject line

Full Name: Jamie Robinson

Phone (Wk): 03 372 6459

Organisation*: As One Incorporated

Phone (Cell): 021 376 459

* the organisation that this submission is made on behalf of

Postal Address: c/- Duncan Cotterill, PO Box 5, Christchurch 8013

Email: jamie.robinson@duncancotterill.com

Contact name and postal address for service of person making submission (if different from above):

Only certain people can make further submissions. Please tick the option that applies to you:

- ☐ I am a person representing a relevant aspect of the public interest; or
- ☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
- ☐ I am the local authority for the relevant area.

- ☐ 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 your submission in a joint case with others making a similar submission at any hearing

Service of your further submission:

Please note: any person making a further submission must **serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury**. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____ **Date:** _____

(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.

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
<i>Name & postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Allow or disallow</i>
Agri Magic Limited	PC7-131	As One supports the submission of Agri Magic Limited.	As One seeks that the entire Agri Magic submission be allowed.
Ballance Agri-Nutrients Limited Hewletts Road, Mount Maunganui Private Bag 12 503 Tauranga Mail Centre 3143	PC7-441 (support generally apart from below).	As One supports the submission of Ballance, <u>apart from</u> the nitrogen reduction as outlined in Table 8-9. Reasons for that is outlined further below. In particular, As One supports the submission that outlines consideration is needed to ensure water quality is protected and restored while still providing for the ability for outcomes, limits and aspirational nutrient reductions to be informed by evolving science. As One agrees that insufficient analysis has been completed to account for the physical and financial performance of farms under the requirements of PC7. This is particularly clear when assessing Table 8-9.	As One seeks that the Ballance submission be allowed, apart from that part outlined below.
	PC7-441.28	As One opposes in part the relief sought by Ballance in relation to Table 8-9. As outlined in its original submission, As One opposes the introduction of nitrogen loss limits beyond the baseline GMP limit. However, As One supports the submission requiring a comprehensive monitoring programme, and that rules and future approaches are derived from that monitoring of actual effects and changes.	As One seeks that the relief sought in relation to Table 8-9 is disallowed, and instead the relief sought in As One's original submission is allowed.
Dairy NZ Lincoln PO Box 85066 Lincoln University 7647	PC7-357	As One supports all aspects of the Dairy NZ submission, <u>apart from</u> the nitrogen reduction as outlined in the row below.	As One seeks that the relief sought be allowed, apart from that element of the relief that relates to Table 8-9 and nitrogen reductions.
	PC7-357.42	As One opposes the acceptance of a 15% reduction in nitrogen below baseline GMP. As One refers to the economic modelling prepared by Dairy NZ which establishes that 10% is an achievable target.	As One seeks that this part of the submission be disallowed.
Federated Farmers of New Zealand PO Box 414	PC7-430.289	As One supports the position of Federated Farmers in relation to the uncertainty and concerns with the farm portal, the GMP baseline, notification and the s32 analysis.	As One seeks the Federated Farmers submission be allowed, in particular the adaptive management approach

Ashburton 7740			sought, accompanied by increased monitoring requirements as sought in the original As One submission.
	PC&-430	As One supports the position that the groundwater effects on the Christchurch water supply are overstated in the PC7 documents.	
	PC7-430.290	As One supports the submission that economic issues arising out of reductions have not been properly calculated, and the impacts of the economic effects have not been adequately assessed. This results in a section 32 report which does not assess the true impact of the proposal on the social well-being of the rural community, and the district as a whole.	
	PC7-430.144	As One opposes the approach taken to Table 8-9	As set out in its original submission, As One seeks the deletion of Table 8-9 in its entirety. The submission of Federated Farmers sets out the initial round of reductions out to 2030 be implemented "if it is demonstrated that they are needed". As One considers that no need has been established to reduce beyond GMP, and so considers the table should be deleted.
Christchurch City Council c/- Peter Kingsbury Strategy and Transformation PO Box 73012 Christchurch 8154	PC7-337.168, 188, 190, 102,107	As One opposes the relief sought by Christchurch City Council submission. While it agrees with the criticism of the s32 analysis in the area of social and economic impacts, that shortcoming suggests that the grounds for the more stringent controls proposed by the plan change, and the even more stringent controls sought by the submissions, are not established. In particular, the submission's comments on aquifer effects are not underpinned by appropriate evidence. It provides no basis on which to find that either the measures as notified, or the further amendments to Table 8-9 it seeks would not have a devastating social and economic impact on the Waimakariri rural community. It remains As One's submission that such devastating effects would follow and would be exacerbated by the changes sought by this submitter. Any restrictions beyond those supported by As One are not justified by a properly demonstrated risk to water quality.	As One seeks that the shortcomings in the s32 analysis on social and economic effects be acknowledged, but that the relief sought by Christchurch City Council submission is disallowed, as it does not show that the economic costs of the relief sought are justified by the evidence of the risks to water quality.
Ravensdown Limited c/- Planz Consultants Limited	PC7-114	As One supports the Ravensdown submission. In particular, As One recognises the role that Ravensdown has played in the working group to 'fix' the Farm Portal. As One shares the concerns outlined by Ravensdown in relation to the use of the	As One seeks that the relief included in the Ravensdown submissions is allowed, apart from where a different

PO Box 1845 Christchurch 8140		Farm Portal.	approach is supported below.
		As One opposes in part the relief sought by Ravensdown in relation to Table 8-9. As outlined in its original submission, As One opposes the introduction of nitrogen loss limits beyond the baseline GMP limit. However, As One supports the submission introducing FEP requirements that focus on freshwater outcomes being sought, rather than the focus on continual staged reductions.	As One seeks that the relief sought, in relation to retaining the 15% reduction (dairy) and 5% reduction (all others) by 2030 is disallowed. As One seeks instead that the approach put forward by As One in its original submission is allowed.
Sparrow Family Trust and Mary Sparrow 2 McRoberts Road Rangiora 7475	PC7-133	As One supports the Sparrow submission. In particular, As One supports the position that a range of previous land uses have impacted current water quality, and local legacy issues should be considered, rather than simply controls on farming.	As One seeks that the entire Sparrow submission be allowed.
Waimakariri Next Generation Farmers Trust c/- Prosser Quirke, PO Box 4 Rangiora.	PC7-425.33	As One supports in part the Waimakariri Next Generation Farmers Trust (NGF) submission. As One agrees with the NGF in relation to the importance of freshwater, and the importance of the NES in freshwater management. Therefore, As One supports the submission that the hearings on PC7 (including evidence exchange) should be run in a way which allows consideration of the NES guidance.	As One seeks that the NGF submission is allowed as it relates to the timing of the PC7 hearing.
	PC425-30	As One opposes the submission of NGF as it relates to Table 8-9. In particular, As One considers, as outlined in its original submission, that the Nitrogen reductions contained in Table 8-9 are arbitrary, and not based on evidence. As One also considers that the economic effects of such reductions has not been adequately assessed, and the social and economic impact on the wider region has not been considered.	As One seeks that the part of the NGF submission relating to Nitrogen reductions and Table 8-9 is disallowed, and instead the measurement approach outlined in the original As One submission is adopted.

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

From: [Jamie Robinson](#)
To: [Tavisha Fernando](#)
Subject: RE: Further Submission - Proposed Plan Change 7 to the Land and Water Regional Plan - As One Incorporated [DC-Documents.FID2837222]
Date: Thursday, 23 January 2020 4:49:01 PM
Attachments: [image001.png](#)
[As One PC7 Further Submission \(23.1.20\) \(11035590_1\).PDF](#)

Good afternoon Tavisha.

Please find the updated table **attached**.

Kind regards,
Jamie.

Jamie Robinson
Associate

d +64 3 372 6459 | p +64 3 379 2430 | m +64 21 376 459
duncancotterill.com | [View Duncan Cotterill LinkedIn](#)

Duncan Cotterill Plaza 148 Victoria Street
PO Box 5 Christchurch 8140 New Zealand

Click [here](#) for office directions



From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Sent: Wednesday, 22 January 2020 11:54 AM
To: Jamie Robinson <jamie.robinson@duncancotterill.com>
Subject: FW: Further Submission - Proposed Plan Change 7 to the Land and Water Regional Plan - As One Incorporated

Tena koe Jamie

Further our telephone call, please see below for further information on the submission points that we require clarification on.

Nga mihi

Tavisha

From: Tavisha Fernando
Sent: Tuesday, 17 December 2019 3:37 PM
To: jamie.robinson@duncancotterill.com
Subject: Further Submission - Proposed Plan Change 7 to the Land and Water Regional Plan - As One Incorporated

Tena koe Jamie

We are currently processing further submissions on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan.

In order for us to ensure that the further submission points received on behalf of As One Incorporated are assigned to the correct submission point, please can you provide the following further information;

- Can you provide the submission numbers that should be referenced for the second point for Federated Farmers of New Zealand.
- Can you provide the clarity on which submission numbers for Ravensdown Limited As One Incorporated are supporting and opposing.

Nga mihi

Tavisha

This message may contain confidential and privileged information. If you have received this e-mail in error, please advise us by return e-mail or telephone and then delete this e-mail together with all attachments. Please visit <https://www.duncancotterill.com/emaildisclaimer> for other important information concerning this message.

Submitter ID:

File No:

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

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by **5.00pm 29 November 2019** to:

Customer Services
Environment Canterbury
P O Box 345
Christchurch 8140

or

by email to mailroom@ecan.govt.nz
with "Plan Change 7 LWRP Further Submission"
in the subject line

Full Name: Jamie Robinson

Phone (Wk): 03 372 6459

Organisation*: As One Incorporated

Phone (Cell): 021 376 459

* the organisation that this submission is made on behalf of

Postal Address: c/- Duncan Cotterill, PO Box 5, Christchurch 8013

Email: jamie.robinson@duncancotterill.com

Contact name and postal address for service of person making submission (if different from above):

Only certain people can make further submissions. Please tick the option that applies to you:

- ☐ I am a person representing a relevant aspect of the public interest; or
- ☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
- ☐ I am the local authority for the relevant area.

- ☐ 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 your submission in a joint case with others making a similar submission at any hearing

Service of your further submission:

Please note: any person making a further submission must **serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury**. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____ **Date:** _____

(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.

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
<i>Name & postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Allow or disallow</i>
Agri Magic Limited	PC7-131	As One supports the submission of Agri Magic Limited.	As One seeks that the entire Agri Magic submission be allowed.
Ballance Agri-Nutrients Limited Hewletts Road, Mount Maunganui Private Bag 12 503 Tauranga Mail Centre 3143	PC7-441 (support generally apart from below).	As One supports the submission of Ballance, <u>apart from</u> the nitrogen reduction as outlined in Table 8-9. Reasons for that is outlined further below. In particular, As One supports the submission that outlines consideration is needed to ensure water quality is protected and restored while still providing for the ability for outcomes, limits and aspirational nutrient reductions to be informed by evolving science. As One agrees that insufficient analysis has been completed to account for the physical and financial performance of farms under the requirements of PC7. This is particularly clear when assessing Table 8-9.	As One seeks that the Ballance submission be allowed, apart from that part outlined below.
	PC7-441.28	As One opposes in part the relief sought by Ballance in relation to Table 8-9. As outlined in its original submission, As One opposes the introduction of nitrogen loss limits beyond the baseline GMP limit. However, As One supports the submission requiring a comprehensive monitoring programme, and that rules and future approaches are derived from that monitoring of actual effects and changes.	As One seeks that the relief sought in relation to Table 8-9 is disallowed, and instead the relief sought in As One's original submission is allowed.
Dairy NZ Lincoln PO Box 85066 Lincoln University 7647	PC7-357	As One supports all aspects of the Dairy NZ submission, <u>apart from</u> the nitrogen reduction as outlined in the row below.	As One seeks that the relief sought be allowed, apart from that element of the relief that relates to Table 8-9 and nitrogen reductions.
	PC7-357.42	As One opposes the acceptance of a 15% reduction in nitrogen below baseline GMP. As One refers to the economic modelling prepared by Dairy NZ which establishes that 10% is an achievable target.	As One seeks that this part of the submission be disallowed.
Federated Farmers of New Zealand PO Box 414	PC7-430.289	As One supports the position of Federated Farmers in relation to the uncertainty and concerns with the farm portal, the GMP baseline, notification and the s32 analysis.	As One seeks the Federated Farmers submission be allowed, in particular the adaptive management approach

Ashburton 7740			sought, accompanied by increased monitoring requirements as sought in the original As One submission.
	PC7-430.69	As One supports the position that the groundwater effects on the Christchurch water supply are overstated in the PC7 documents.	
	PC7-430.290	As One supports the submission that economic issues arising out of reductions have not been properly calculated, and the impacts of the economic effects have not been adequately assessed. This results in a section 32 report which does not assess the true impact of the proposal on the social well-being of the rural community, and the district as a whole.	
	PC7-430.144	As One opposes the approach taken to Table 8-9	As set out in its original submission, As One seeks the deletion of Table 8-9 in its entirety. The submission of Federated Farmers sets out the initial round of reductions out to 2030 be implemented "if it is demonstrated that they are needed". As One considers that no need has been established to reduce beyond GMP, and so considers the table should be deleted.
Christchurch City Council c/- Peter Kingsbury Strategy and Transformation PO Box 73012 Christchurch 8154	PC7-337.168, 188, 190, 102,107	As One opposes the relief sought by Christchurch City Council submission. While it agrees with the criticism of the s32 analysis in the area of social and economic impacts, that shortcoming suggests that the grounds for the more stringent controls proposed by the plan change, and the even more stringent controls sought by the submissions, are not established. In particular, the submission's comments on aquifer effects are not underpinned by appropriate evidence. It provides no basis on which to find that either the measures as notified, or the further amendments to Table 8-9 it seeks would not have a devastating social and economic impact on the Waimakariri rural community. It remains As One's submission that such devastating effects would follow and would be exacerbated by the changes sought by this submitter. Any restrictions beyond those supported by As One are not justified by a properly demonstrated risk to water quality.	As One seeks that the shortcomings in the s32 analysis on social and economic effects be acknowledged, but that the relief sought by Christchurch City Council submission is disallowed, as it does not show that the economic costs of the relief sought are justified by the evidence of the risks to water quality.
Ravensdown Limited c/- Planz Consultants Limited	PC7-114 Introduction: Areas of Concern <i>Farm Portal</i>	As One supports the Ravensdown submission. In particular, As One recognises the role that Ravensdown has played in the working group to 'fix' the Farm Portal. As One shares the concerns outlined by Ravensdown in relation to the use of the	As One seeks that the relief included in the Ravensdown submissions is allowed, apart from where a different

PO Box 1845 Christchurch 8140		Farm Portal.	approach is supported below.
	PC7-114.67	As One opposes in part the relief sought by Ravensdown in relation to Table 8-9. As outlined in its original submission, As One opposes the introduction of nitrogen loss limits beyond the baseline GMP limit. However, As One supports the submission introducing FEP requirements that focus on freshwater outcomes being sought, rather than the focus on continual staged reductions.	As One seeks that the relief sought, in relation to retaining the 15% reduction (dairy) and 5% reduction (all others) by 2030 is disallowed. As One seeks instead that the approach put forward by As One in its original submission is allowed.
Sparrow Family Trust and Mary Sparrow 2 McRoberts Road Rangiora 7475	PC7-133	As One supports the Sparrow submission. In particular, As One supports the position that a range of previous land uses have impacted current water quality, and local legacy issues should be considered, rather than simply controls on farming.	As One seeks that the entire Sparrow submission be allowed.
Waimakariri Next Generation Farmers Trust c/- Prosser Quirke, PO Box 4 Rangiora.	PC7-425.33	As One supports in part the Waimakariri Next Generation Farmers Trust (NGF) submission. As One agrees with the NGF in relation to the importance of freshwater, and the importance of the NES in freshwater management. Therefore, As One supports the submission that the hearings on PC7 (including evidence exchange) should be run in a way which allows consideration of the NES guidance.	As One seeks that the NGF submission is allowed as it relates to the timing of the PC7 hearing.
	PC425-30	As One opposes the submission of NGF as it relates to Table 8-9. In particular, As One considers, as outlined in its original submission, that the Nitrogen reductions contained in Table 8-9 are arbitrary, and not based on evidence. As One also considers that the economic effects of such reductions has not been adequately assessed, and the social and economic impact on the wider region has not been considered.	As One seeks that the part of the NGF submission relating to Nitrogen reductions and Table 8-9 is disallowed, and instead the measurement approach outlined in the original As One submission is adopted.

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