

**From:** [Judy-Anne Stapleton](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Johanna King](#)  
**Subject:** RE: Plan Change 7 to the LWRP Submission  
**Date:** Tuesday, 21 July 2020 1:10:19 PM  
**Attachments:** [Signed Statement of Evidence of Megan Grant dated 17 July 2020.pdf](#)

---

Good afternoon

Further to our email dated 17 July 2020, we now **attach** the signed Statement of Evidence of Megan Grant.

Thank you for your assistance.

Regards

Judy-Anne

Judy-Anne Stapleton | Personal Assistant



T +64 3 374 9999 **DDI** [+64 3 963 8016](#)  
F +64 3 374 6888  
E [judy-anne.stapleton@tp.co.nz](mailto:judy-anne.stapleton@tp.co.nz)

Tavendale and Partners Limited  
Level 3, Tavendale and Partners Centre  
329 Durham Street North  
PO Box 442  
Christchurch 8140, New Zealand  
[www.tp.co.nz](http://www.tp.co.nz)

---

**From:** Judy-Anne Stapleton <[judy-anne.stapleton@tp.co.nz](mailto:judy-anne.stapleton@tp.co.nz)>  
**Sent:** Friday, 17 July 2020 5:28 PM  
**To:** 'mailroom@ecan.govt.nz' <[mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)>  
**Cc:** Johanna King <[johanna.king@tp.co.nz](mailto:johanna.king@tp.co.nz)>  
**Subject:** Plan Change 7 to the LWRP Submission

Good afternoon

We act for Rangitata South Irrigation Limited (**RSIL**).

We **attach**, for lodging on behalf of RSIL, Statements of Evidence of the following:

- Eva May Harris;
- Dr Glen Andrew Treweek;
- Julian James Weir;
- Mark Rutherford Everest;
- Megan Minchen Grant - Ms Grant has approved her brief as attached but has been unable to affix her signature. A signed copy will be submitted as soon as possible;
- Murray Alan Turley; and
- Susan Clare Ruston.

Please acknowledge receipt.

Regards

Judy-Anne

**Judy-Anne Stapleton** | Personal Assistant



**Tavendale  
and Partners**

T +64 3 374 9999 DDI [+64 3 963 8016](tel:+6439638016)

F +64 3 374 6888

E [judy-anne.stapleton@tp.co.nz](mailto:judy-anne.stapleton@tp.co.nz)

Tavendale and Partners Limited  
Level 3, Tavendale and Partners Centre  
329 Durham Street North  
PO Box 442  
Christchurch 8140, New Zealand  
[www.tp.co.nz](http://www.tp.co.nz)

**Our offices and client centres in both Christchurch and Ashburton are open with increased cleaning measures in place to keep you+us safe.**

[From 1 July 2018, we are required to verify our clients identities and addresses, and obtain other information in accordance with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 \(AML/ CFT\). \*\*For more information, click here\*\*](#)

---

This email or attachments may contain confidential or legally privileged information intended for the sole use of the addressee(s). Any use, redistribution, disclosure, or reproduction of this message, except as intended, is prohibited. If you received this email in error, please notify the sender and remove all copies of the message, including any attachments. Any views or opinions expressed in this email (unless otherwise stated) may not represent those of Tavendale and Partners Limited.

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY  
THE CANTERBURY REGIONAL COUNCIL**

**IN THE MATTER OF**     The Resource Management Act 1991

**AND**

**IN THE MATTER OF**     Submissions and further submissions by Rangitata  
South Irrigation Limited on Proposed Plan Change 7  
to the Canterbury Land and Water Regional Plan

---

**STATEMENT OF EVIDENCE OF MEGAN GRANT**

**17 JULY 2020**

---

---

**Tavendale and Partners**

Lawyers, Christchurch  
Level 3, Tavendale and Partners Centre, 329 Durham Street North  
P O Box 442  
Christchurch 8140  
Telephone: (03) 374-9999, Facsimile (03) 374-6888

Solicitor acting: J R King

## **Contents**

<b>Introduction .....</b>	<b>3</b>
<b>Family Connection to the Land .....</b>	<b>3</b>
<b>Our current farm operations .....</b>	<b>3</b>
<b>Environmental History.....</b>	<b>4</b>
<b>Our farm's involvement in the Scheme .....</b>	<b>5</b>
<b>The Nitrogen Baseline period as it applies to my farm.....</b>	<b>6</b>

## STATEMENT OF EVIDENCE OF MEGAN GRANT

### Introduction

- 1 My name is Megan Minchen Grant. I am a fifth-generation farmer and Rangitata South Irrigation Limited (**RSIL**) shareholder, farming in the Rangitata/Orton area.
- 2 I have been asked to provide my story to the Hearing Panel, of how the PC7 rules will affect my farm going forward. Specifically, how my farm's Nitrogen Baseline calculation and further reductions required beyond Good Management Practice (**GMP**) will have disastrous consequences for our farm.

### Family Connection to the Land

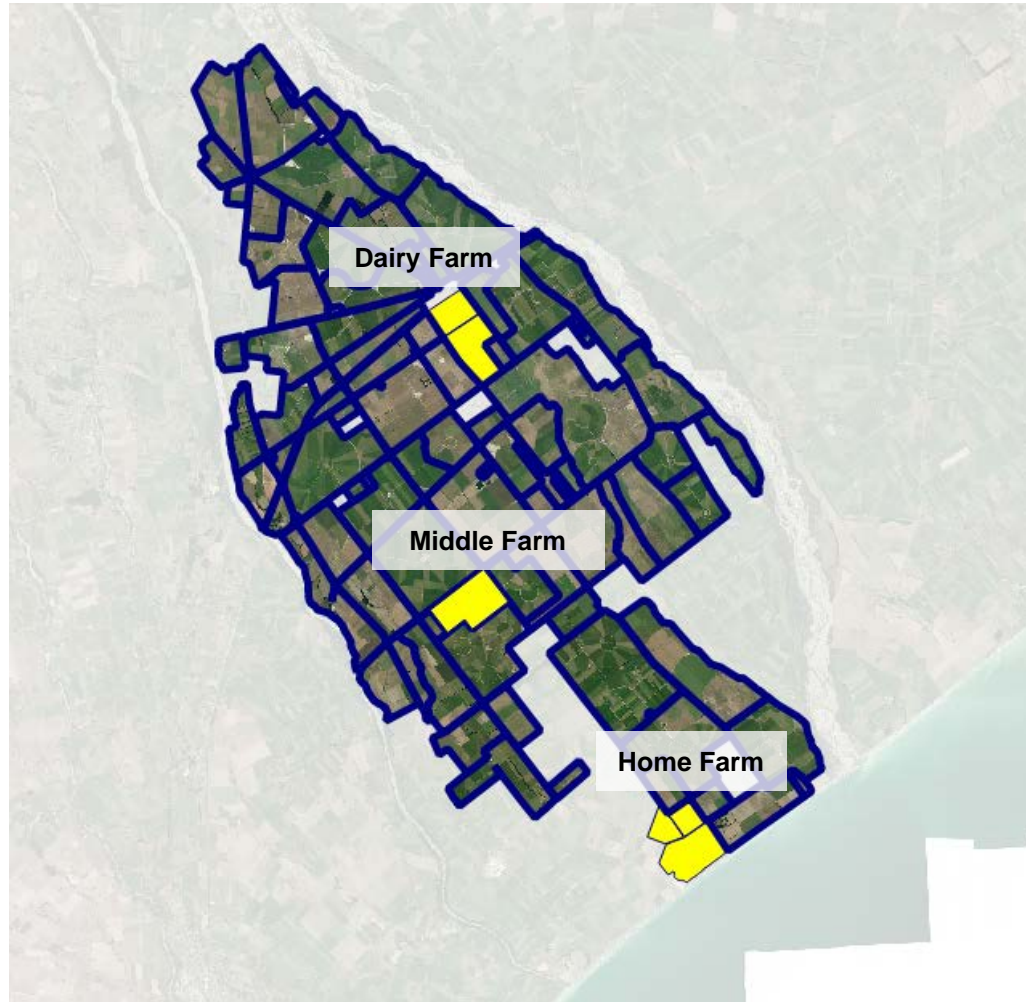
- 3 My family first bought land in the Rangitata/Orton area in 1878, with our current "Home Block" farm owned by my family since 1910. I run our family farm alongside my husband Bryce and our two sons Lachlan (two and a half years old) and George (two months old), having taken over when my father passed away suddenly in 2014.

### Our current farm operations

- 4 We farm 757 hectares which is split into three blocks to create an integrated, self-contained dairy system (**Figure 1**).
- 5 We have two full time employees, along with two casual employees for harvest and other busy times. On our dairy farm we now have a contract milker (Joe) who has four of his own staff.
- 6 The first block (**Dairy Farm**) is our 265 ha, on which we milk 850 crossbred cows through a 60 bale milfos shed. Most bobby calves from the dairy farm get raised for beef on our other two farms.
- 7 The second block (**Middle Farm**) is our 197.5 ha, where we raise our young stock for the dairy farm and do our own winter grazing. We also winter graze my neighbour's (my cousin) cows for the winter. There are around 100 beef calves taken through until 20 to 24 months old.
- 8 The third block (**Home Farm**) is our home farm which has been in the family since 1910. It is a mixed arable, horticulture, beef, sheep and dairy grazing unit.

We have 60 to 80 hectares of cereals grown specifically for feeding our cows through the dairy shed feeding system.

Figure 1: Megan Grant Family Farms



- 9 Dad and I specifically set up our farm system to support animal health and welfare, minimise biosecurity risks and diversify our income streams. The system would not work unless all three blocks were irrigated and able to provide the services to the Dairy Farm.

### **Environmental History**

- 10 As a shareholder of RSIL, we have needed a Farm Environment Plan (FEP) and were audited every year for the first three years of operation. We have always achieved at least a “B” grade for our audits, with no major issues noted.
- 11 We have also recently fenced a native lizard sanctuary on the Dairy Farm. The Home Farm has a significant natural area where a native or rare herb grows.

There is also native tussock area on our roadside which has recently become recognised as a significant natural area.

### **Our farm's involvement in the Scheme**

- 12 Back before the Scheme was built, we had a very shallow well and we irrigated 60 hectares of ground using a single gun irrigator. It was not uncommon for the gun to cut out mid run due to lack of water and it was unable to keep up with the area that it could be run on. I remember my parents telling me back in 2009 that we had the opportunity coming up to buy into the scheme as everything was falling into place. They referred to it as the last chance for us to ever have irrigation in the Rangitata/Orton area and to be able to put the years of constant dry summers of struggling to feed our ewes and earn an alright income behind us. We had all breeding ewes and crop (milling and feed) back then. The lamb prices had been terrible for years so the chance to diversify further was amazing. Over the past ten years we had watched so many dairy conversions happen, and the once dry, brown Rangitata Island turn green and flourish. To get the chance to be a part of this was exciting.
- 13 In March 2010, my parents confirmed that we would be converting one farm to dairy, with the idea to convert a second dairy farm the year after and having our third farm as the wintering and dry stock block for the two dairy farms. I was in Western Australia working on a cattle station when they messaged me to let me know that plans had properly begun for the dairy conversion and a more intensive system all round and to call when I got the chance. Their excitement was very obvious. In 2012, the conversion to more intensive farming began with winter feed planting in preparation for our own cows to arrive in June 2013.
- 14 The sale of 2,600 breeding ewes in January 2013 allowed for the regressing of the dairy conversion to more suitable pasture for milking cows under pivots. We started raising beef calves from our first calving to shift to a bull beef/beef system until the second dairy farm was converted. As the water did not arrive until 2014 (12 months later than expected), we ended up selling our first calves and grazing out our replacement heifer calves due to it being too dry.
- 15 In December 2012, my dad purchased ten pivots to cover the three farms. All three farms were planned to be fenced in a way where they could be converted to a dairy farm with no extra changes other than a dairy shed and effluent system built. Before his passing in September 2014, we had completed our first season on our dairy arm with all the basics complete. We also had the two pivots and our storage pond at our second farm built, leaving the stock water

system and full re-fencing to be done, but the pivots were up and running. At the third farm we had two pivots out of four built and the mainline had been started. Our storage pond was complete (and full) with more re fencing, lanes and stock water to be done.

- 16 Our family purchased shares for the Rangitata South Irrigation Scheme on the 29<sup>th</sup> of November 2012 and the cost was \$70 per share which was spread across three payments. Followed by a fourth payment of \$65 per share on the 21<sup>st</sup> of October 2015.

### **Taking over the farm**

- 17 The cost to develop the majority of the three farms has been \$6,400,000. Cost breakdown includes:
- 10 pivots, three irrigation storage ponds and power = \$4,000,000
  - Lanes = \$100,000
  - Dairy shed = \$1,400,000
  - Houses = \$500,000
- 18 Water arrived on the Dairy Farm and Middle Farm in 2014 and 2015 for the Home Farm (located near the sea).

### **The Nitrogen Baseline period as it applies to my farm**

- 19 The Nitrogen Baseline is calculated from the farm's actual activities during the Baseline period – 1 January 2009 to 31 December 2013, which includes the transitional development, but before the farm fully converted to their current uses to pay for it.
- 20 We were advised by ECan when we applied for farming resource consent for the Dairy Farm in 2013 that our other properties were a permitted activity under Rule 5.39 of the Proposed Land and Water Regional Plan rules (see permitted activity notice CRC140233) and that we should apply for the lawfully intensified provisions when we could apply for consent after July 2017.
- 21 When we went to apply for consent in 2017, I found out that the information provided by Environment Canterbury in 2013 was incorrect. We actually should have applied for land use consent in 2013 under Rule 5.42 (change of land use within a red zone), and by not doing so has meant we are now not actually able



to apply for consent under the lawful intensification provisions as RSIL did not have a nitrogen discharge limit as part of their water take consent.

- 22 The outcome is that 2/3<sup>rd</sup> of my farm essentially missed the cut-off. Because of this, our intended operations – intended ever since we purchased pivots in November 2012 (intention to purchase shares was many years before) – are not able to be factored into our Nitrogen Baseline calculation.
- 23 I agree that all farms should be operating to GMP and do what they can to improve water quality. What is frustrating for me however is that we are essentially required to operate at GMP for a system that we no longer run, and have not run since 2012 as it wouldn't pay for the irrigation development and a bank loan to develop wouldn't have been approved on that basis. By December 2012 we had planted a lot of winter crop for our dairy cows and grazing cattle for the following winter.
- 24 The difference between our nitrogen discharge allowances under the current LWRP definitions and rules, and what they would be if we were able to be treated like the exempted farms, is shown for the Middle Farm below:

	<b>Nitrogen Baseline (kg N/ha)</b>	<b>Baseline Loss Rate (kg N/ha)</b>	<b>GMP</b>	<b>2035 Nitrogen Rate (kg N/ha)</b>	<b>Target Loss</b>
<b>Current rules</b>	41	22		20	
<b>If allowed as an exemption</b>	79	51		46	

- 25 With the current debt levels we hold, our farming operation will become unviable at the nitrogen limits we currently face, let alone with the additional reduction targets. Our land values are reduced as no one else can operate the land profitably within these nitrogen limits. Without the ability to obtain land use consent, we have no certainty in the long term prospects of the family farm, we cannot sell our farm, we cannot lease it out nor can we borrow any further money to implement further mitigations. We also cannot reduce the intensity of the farming system to comply with our baseline and maintain the ability to service our mortgages.

- 26 By allowing RSIL shareholders to have an achievable baseline, we will have the time to sort out our business financially so we can get on with making the improvements we need to on farm.

A handwritten signature in blue ink, appearing to read 'M Grant'.

**Megan Grant**

17 July 2020