

## Gay Gibson

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**From:** ECInfo <ecinfo@ecan.govt.nz>  
**Sent:** Friday, 21 March 2014 9:14 a.m.  
**To:** Mailroom Mailbox  
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----- Original Message -----

**From:** Begley, Cathy  
**Received:** 21/03/2014 8:04 a.m.  
**To:** ECInfo; Services, Customer  
**Subject:** Variation 1

Please find attached a submission on variation 1 from Ngai Thau

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**Resource Management (Form, Fees and Procedure) Regulations - Schedules 2003****Form 5**

*Clause 6 of the First Schedule, Resource Management Act 1991*

**Submission on a publicly notified proposal for a plan**

To: Environment Canterbury  
PO Box 345  
Christchurch

**Name of Submitter:**

*Te Ngāi Tūāhuriri Rūnanga Inc., Te Rūnanga o Koukourārata Society Inc., Wairewa Rūnanga Inc., Ōnuku Rūnanga Inc., Te Hapū o Ngāti Wheke and Te Rūnanga o Ngāi Tahu*

**This is a submission on the following proposed plan - Proposed Variation 1 to the Canterbury Land and Water Regional Plan**

**I could not gain an advantage in trade competition through this submission.**

**The specific provisions of the proposal that my submission relates to are:**

The entire variation and section 32 report.

**Our submission is:**

Te Ngāi Tūāhuriri Rūnanga Inc., Te Rūnanga o Koukourārata Society Inc., Wairewa Rūnanga Inc., Ōnuku Rūnanga Inc., Te Hapū o Ngāti Wheke and Te Rūnanga o Ngāi Tahu (Ngāi Tahu), support Variation 1 to the proposed Land and Water Regional Plan and the section 32 analysis. In fact Ngāi Tahu view Variation 1 as an import step towards a time when the quality of water entering Te Waihora is of such a standard that active management within the catchment is no longer required.

We understand that over the past two years the Selwyn Te Waihora Zone Committee have worked incredibly hard in preparing a Zone Implementation Program (ZIP) Addendum which aims to address a number of water quality and quantity issues within this catchment.

It is our view however, that Variation 1 to the proposed Land and Water Regional Plan and section 32 reports as notified, dose not accurately translate the ZIP addendum into a policy and rule framework. Thus, we have made specific requests for changes under the topics and submissions below.

The submission addresses key issues for Ngāi Tahu by topic, followed by suggested amendments to any other policies and rules, provision-by-provision.

**We seek the following decisions from the Council:**

Retain all provisions of Variation 1 as notified except where amendments are required to give effect to the decisions requested in this submission

**1. WHOLE OF THE VARIATION**

**Our reasons are:**

While we support the use of the dual place name for the catchment, we consider that when using dual place names, the correct name should be used.

**We seek the following decisions from the Council:**

Replace all references to 'Selwyn Waihora' with 'Selwyn Te Waihora'

**AND**

Any other consequential amendments

**2. SECTION 11 – SELWYN TE WAIHORA**

**Our reasons are:**

We support the section which provides the 'context' and 'sets the scene' for why it is necessary for the sub regional chapter and that this section is needed to set out what the Zone Committee were trying to achieve via their ZIP Addendum. Unfortunately, this section doesn't then recognise that because Ngāi Tahu own most of the bed of Te Waihora, that this means that it is one of the largest landowners within the catchment.

It should also be noted within this section that Te Waihora is located at the bottom of the catchment and effectly 'collects' the from the vast majority of the catchment.

Further, Ngāi Tahu supports the vision of the Variation being "*To restore the mauri of Te Waihora while maintaining the prosperous land-based economy and thriving communities*". In the view of Ngāi Tahu the vision should be elevated to that of an objective.

Lastly, Ngāi Tahu notes that the variation doesn't address any cross boundary issues which may impact upon the plan being able to achieve its vision. This is due to the boundary of the zone stopping at the foot hills. This is of particular concern to Ngāi Tahu are aware that under the pLWRP the hill and high country is classified as having a 'green' nutrient status which allows for intensification within these zones relatively unchecked. Allowing additional intensification of land use which is effectively 'upstream' of this zone could severely impact upon the ability of the community to achieve the water quality outcomes.

**We are seeking the following decision:**

Amend the paragraph beginning "Te Waihora/Lake Ellesmere is a tribal taonga..." by adding

*This means that Te Rūnanga o Ngāi Tahu are one of the largest land owners within the catchment and have dual roles within the catchment one as Kaitiaki the other as land owner.*

**AND**

Amend the paragraph beginning "In the last 20 years..." by adding:

*"...deteriorated as it is located bottom of the catchment.*

**AND**

Include a new objective:

*To restore the mauri of Te Waihora while maintaining the prosperous land-based economy and thriving communities*

**AND**

Amend the variation to include a section which address cross-boundary issues in particular where land use intensification has the ability to hamper the achievement of the catchments water quality outcomes.

**AND**

Any other consequential amendments

**3. POLICIES**

We are generally supportive of the concepts raised within the Policies of the variation. However we are requesting a rewrite of a number of the water quality and quantity policies.

**Our reasons are:**

- We believe there is an opportunity to better achieve the purpose of the RMA and give effect to the NPS for Freshwater, the RPS, and the ZIP addendum through the suggested amendments to the variations policies.

**We seek the following decisions from the Council:**

Replace Polcies 11.4.6 to 11.4.17 with the folloing

1.

- (a) In recognition that Te Waihora/Lake Ellesmere is a taonga and of immense importance to Ngāi Tahu and to ensure that the Mauri of Te Waihora/Lake Ellesmere is resorted and the water quality outcomes are met within the Selwyn Te Waihora catchment, over time reduce the amount of contaminants entering Te Waihora/Lake Ellesmere so that a TLI score of 4.8 is achieved; and
- (b) As a first step towards achieving the water quality outcomes with the Selwyn Te Waihora Catchment the total amount of nitrogen entering the catchment is limited to that set out within Table 11 (i).

2. Reduce the discharge of contaminants entering the catchment from waste water systems by:

- (a) Prohibiting the discharge of untreated wastewater, liquid waste or sludge waste from either community, industrial or trade process or on-site domestic wastewater systems directly to groundwater or surface waterways;
- (b) From 2025 prohibiting the discharge of treated wastewater, liquid waste or sludge waste from either community, industrial or trade process or on-site domestic wastewater systems directly to groundwater or surface waterways;
- (c) Enabling the discharge of treated wastewater, liquid waste or sludge waste from either community, industrial or trade process or on-site domestic wastewater systems to land provided:
  - (i) on-site domestic wastewater systems which existed as of 13 February 2014 comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 – On-site Domestic Wastewater Management by 1 January 2019;
  - (ii) all new on-site domestic wastewater systems comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 – On-site Domestic Wastewater Management;
  - (iii) community and industrial or trade process wastewater systems which existed as of 13 February 2014 have adopted Best Practicable Options to meet load limit by 1 January 2019; and

- (iv) all new community or industrial or trade process wastewater systems to meet the load limit.
3. Reduce the loss of contaminants from farming activities into the catchment by:
- (a) Excluding livestock from all waterways, including drains; and
  - (b) Providing setbacks from grazing and cultivation from waterways and where appropriate riparian planting.
  - (c) Requiring all farming practices to implement the good management practices listed in Schedule 24 to minimize the loss of contaminants into water;
  - (d) Avoiding any increase in nitrogen-nitrate loss is the estimated nitrogen loss from a farm estimated using Overseer is greater than 15kg/ha/year; and
  - (e) Requiring those framings practices with nitrogen-nitrates losses which are estimated using Overseer to exceed 15kg/ha/yr to progressively reduce their nitrogen-nitrate losses in accordance with Policy 4.
- 4.
- (a) By 1 July 2016 include by way of a plan change a schedule of maximum nitrogen loss rates for farm activities on soil types within the catchment, which farming activities must comply with by 2022; or
  - (b) If no such schedule exists then from 01 July 2017 limit the loss of nitrogen-nitrates from farming activities which are estimated using Overseer to exceed 15kg/ha/year in the following way:
    - (i) Avoid any increase in estimated nitrogen loss from any farming activity whose estimated nitrogen loss using Overseer is greater than 15kg/ha/year; and
    - (ii) Prohibit any farming activity having nitrogen losses estimated using Overseer which exceed 80kg/ha/year.
5. Require rural activities to either prepare and implement a nutrient budget using OVERSEER (or an alternative method) or keep sufficient records as per Schedule X to enable a nutrient budget to be prepared using OVERSEER (or an alternative method).
6. To progressively implement Farm Environment Plans within the catchment where the discharge from the farming activity or farm enterprise discharge is greater than 15kg/ha/year:
- (a) For farming activities or farm enterprise, greater than 10ha in area and located within the Cultural Landscape/Values Management Area, require Farm Environment Plans from 1 January 2016;
  - (b) For farming activities or farm enterprise, greater than 50ha in area and located outside the Cultural Landscape/Values Management Area, require Farm Environment Plans from 1 January 2017;
  - (c) For farming activities or farm enterprise, less than 50ha but greater than 10ha in area and located outside the Cultural Landscape/Values Management Area, require Farm Environment Plans from 1 January 2020.
7. The Farm Environment Plans prepared in accordance with Schedule 7 will:
- (a) Where the current nitrogen discharge rate exceeds 15kg/ha/year
    - (i) Practices to be implemented over a specified timeframe which will ensure that the discharge is not more than the nitrogen/phosphorus discharge loss rate as calculated using either the Matrix of Good Management or an alternative method; and
    - (ii) Practices to be implemented over a specified timeframe which will ensure the discharges are reducing towards achieving a discharge loss of no more than a 15kg/ha/year.
  - (b) Identify and provide mitigation for any environmental risk of the farming operation;
  - (c) Identify methods for minimizing sediment loss from the property;

- (d) How stock will be excluded from waterways (rivers, streams, drains, wetlands and springs);
- (e) Identify and implement methods for ensuring that water is used efficiently;
- (f) Identify and implement methods for addressing the effects on water quality from land drainage water.

Amend Policy 11.4.20 as follows:

11.4.20 Enable managed aquifer recharge and targeted stream augmentation ~~to assist with~~ for the benefit of and improvements to lowland stream flows where:

- (a) Any effects on Ngāi Tahu values, including but not limited to the abundance of and quality of mahinga kai and the mixing of waters are considered appropriate by Ngāi Tahu
- (b) There is no adverse effects upon availability and quality of drinking water supplies; and
- (c) There is no reduction in amount of or quality of natural wetlands; and
- (d) Any adverse impact upon fish migration; and
- (e) There is no reduction in any areas of significant indigenous vegetation or biodiversity.

Replace Policies 11.4.21 to 11.4.32 with the following:

1. The catchments surface water and groundwater resource are managed as a single resource to ensure that the overall ground water levels and pressures are maintained or improved and the flows within the catchments surface water resources are improved.
2. The overall volume of water which can be allocated within the catchment is limited to that contained within Tables 11 (d), 11(e), 11(f) and 11(g).
3. Prohibit the allocation of surface or groundwater which may either singularly or cumulatively result in either the catchment wide or surface and groundwater specific allocations as set out within Tables 11 (d), 11(e), 11(f) and 11(g) being exceeded.
4. Recognise that both Waikewai Creek and Taumutu Creek are wāhi tonga and of immense cultural significance to both Taumutu and Ngāi Tahu and prohibit any surface water abstraction and any groundwater abstraction where there is either a direct or high stream depletion effect.
5. Prohibit the in-stream damming of the full flow on the main stem of Waikirikiri/Selwyn River and Waianiwaniwa River.
6. Require by 2017, or upon transfer, all surface and groundwater permits to contain an annual volume which is based upon the reasonable use test set out within policy 14.
7. Enable the storage of alpine water provided the storage does not:
  - (a) Adversely impact upon Ngāi Tahu cultural values including, but not limited to, the abundance of and quality of Mahinga Kai and the mixing of waters, unless the adverse impacts on cultural values can be addressed to the satisfaction of Ngāi Tahu; and
  - (b) Reduces the availability and quality of drinking water from that available as of 13 February 2014; and
  - (c) There is no reduction in amount of or quality of natural wetlands; and
  - (d) Any adverse impact upon fish migration; and
  - (e) There is no reduction in any areas of significant indigenous vegetation or biodiversity.
8. Upon replacement of any surface water permit or groundwater permit and on all permits by 2025 where there is either a direct, high or moderate stream depletion effect, the minimum flows and partial restrictions as set out within Table 11 (c) apply.
9. Upon replacement of any groundwater permit which had been previously been subject to 'adaptive management conditions'; 'adaptive management conditions' shall continue to apply.

10. To ensure that overall groundwater levels within the West Melton Special Zone are maintained, groundwater permits shall be subject to groundwater trigger levels as set out within Table 11 (h).

11.

(a) To ensure that overall groundwater levels outside the West Melton Special Zone are maintained and improved to provide flows within the catchments streams and waterways, as a result of alpine water being brought into the catchment, ECan shall monitor the catchments groundwater levels.

(b) Should this monitoring show that the introduction of alpine water is not improving the overall groundwater levels and stream flows so that by 2025 minimum flows within the surface waterways can be raised, then ECan shall implement an alternative approach to reduce over allocation within the catchment in accordance with Policy 12.

12. Every water permit holder shall receive an annual volume consisting of:

(a) a primary allocation calculated in accordance with either subclause (b) or (c) of the reasonable use test as set out within policy 14; and a secondary annual volume which is that which is necessary to ensure reliability in 8.5 years out of 10. There shall be no transfer of the secondary annual volume.

(b) A mechanism to indicate that groundwater levels are reaching unacceptably low levels and a mechanism for ceasing the taking of groundwater whenever groundwater levels fall below a specified level.

13. To determine the reasonable use the following shall be applied:

(a) For water permit holders who also hold shares in an irrigation scheme an annual volume from all sources of irrigation water shall be either:

(i) That required to meet demand conditions in 8.5 years out of 10 using an application efficiency of 80% or

(ii) The demonstrated the rate and volume of use; or

(iii) That based upon the implementation of the most efficient and effective irrigation practices for a soil type.

(b) For water permit holders who do not hold shares in an irrigation scheme an annual volume shall be either:

(i) That contained within Schedule 10 of the pLWRP; or

(ii) The demonstrated the rate and volume of use; or

(iii) That based upon the implementation of the most efficient and effective irrigation practices for a soil type.

14. Enable the transfer of water provided the transfer does not:

- (a) Result in more water physically being abstracted from either the groundwater or surface water resource (i.e. one has to demonstrate that the water being transferred has been physically used in the past); and
- (b) Result in the groundwater being transferred from 'downs - plains' to 'up - plains' as shown on the Planning Maps; or
- (c) Result in the transfer of surface or groundwater permits from a person who holds irrigation scheme shares to a person who either does not hold irrigation scheme shares or holds irrigation scheme shares in a different irrigation scheme; or
- (d) Result in the transfer of a surface water permit from one surface waterway to another surface waterway unless the two surface waterways are physically connected; or
- (e) Result in the reduction in the reliability of supply to any ground and surface water permit holder, unless that permit holder has provided their written permission.

**AND**

Any other consequential amendments

**4. FRESHWATER OUTCOMES**

We support including of tables within the variaion which clearly sets out how much water can be abstracted from both ground and surface waterways. However, we consider that Table 11 (g) needs to be expanded to provide surface water allocations.

We also seek the inclusion of a new schedule which would work in parallel with Schedule 24, bu would set out teh information needed to be kept to enable Overseer to be run.

Our reasons are:

- We believe there is an opportunity to better achieve the purpose of the RMA and give effect to the NPS for Freshwater and the RPS, through the suggested amendments to the plan's objectives and strategic policies

**We seek the following decisions from the Council:**

Table 11 (g) be expanded to include a surface water allocation for all of the waterways. The surface water allocaton put within this table should be based upon either the amount of water able to be taken between the minimum flow and when pro-rata restrictions start as per Table 11 (c) or 30% of 7day Mean Annual Low Flow (MALF) whichever is the lesser. The only expction is for Waikekewai and Taumutu Creek where an allocation limit of '0' should be set.

**AND**

Include a new Schedule within the plan which sets out the infromation needed to be kept which would enable OVERSEER to be run in the future.

**AND**

Any other consequential amendments

**5. RULES**

Generally supportive of the changes proposed to Rules 5.8, 5.9,5.26, 5.28, 5.36, and 5.40 of the pLWRP. However it is unclear whether the additional conditions/matters set out within 11.5.1 to 11.5.5 are to be contained within the overarching rules or within Section 11 (Selwyn Te Waihora



Sub Regional) chapter. In our view the additional conditions/matters should be set out within the overarching rules (i.e. Rules 5.8, 5.9, 5.26, 5.28, 5.36, and 5.40 of the pLWRP).

**AND**

In addition, attached to this submission are submission which suggest minor changes to other rules.

**I do wish to be heard in support of my submission.**

**I am prepared to make a joint case with other parties.**

**Signature of Submitter** (or person authorised to sign on behalf of submitter)



**Date: 14 March 2014**

**Address for Service of Submitter:**

*Te Rūnanga o Ngāi Tahu*

*P O Box 13 046*

*Christchurch 8141*

*Attention Cathy Begley/ James Caygill*

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
<b>Christchurch West Melton</b>			
9.5.11 Rule 5.128	Support	In the view of Ngāi Tahu the amendment sought should be a condition of being a Restricted Discretionary Activity rather than a matter over which discretion is restricted.	Amend Rule 5.128 to include a new condition: <i><u>Any take within the West Melton Special Zone complies with the groundwater level restrictions in Table X of Section 9.6.2;</u></i> <b>AND</b> Any consequential amendment
<b>Selwyn –Waihora Sub Regional Section</b>			
11.5.6	Support	We support the concept within the rule where small scale and low leaching activities are permitted. However, in our view all rural activities should either undertake a nutrient budget or keep records to enable a budget to be prepared should there be a ‘problem’ within the catchment.  Further in our view this should also apply to farming enterprises which leach less than 15kg/ha/year of nitrogen.	Amend Rule 11.5.6 as follows: Amending to include farming enterprise <b><i>Despite any of Rules 11.5.7 to 11.5.13, the use of land for a farming activity or farming enterprise in the Selwyn Waihora catchment is a permitted activity provided the following conditions are met:</i></b> <b>AND</b> Replacing Condition 1 1. <i>(a) <u>A nutrient budget has been prepared and implemented in accordance with OVERSEER or an alternative method approved by ECan; or</u></i> <i>(b) <u>records have been kept in accordance with Schedule X;</u></i> <i><u>and</u></i> <b>AND</b> Amending Conditions 2 & 3

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p>2. <u>The property or farming enterprise is less than 10.5 hectares in area and the nitrogen loss calculation for the property or farming enterprise is less than 15kg/ha/year; or</u></p> <p>3. <u>The property or farming enterprise is greater than 10 hectares in area and the nitrogen loss calculation for the property or farming enterprise is less than 15kg/ha/year.</u></p> <p>Any consequential amendment</p>
New rule	Support	<p>We support the early implementation of Farm Management Plans (FMP's) within the Cultural Landscape/Values Area. However, in our view this should happen once the Matrix of Good Management (MGM) numbers are available.</p> <p>We consider that the status of these need to be controlled to enable the quality of the FMPs' to be assessed as adequate for what is being undertaken.</p> <p>Further if a property is located within an irrigation scheme, then in our view the irrigation scheme should be responsible for managing the nutrient discharges of their shareholders.</p>	<p>New Rule</p> <p><b><u>From 1 January 2016 the use of land for a farming activity or a farming enterprise within the Cultural Landscape/Value Management Area is a controlled activity provided the following conditions are met:</u></b></p> <ol style="list-style-type: none"> <li><u>A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7; and</u></li> <li><u>The farming activity or farming enterprise is not irrigated with water from an irrigation scheme.</u></li> </ol> <p>Any consequential amendment</p>
New Rules & Matters of Control	Support	As a consequence of the new rule where farming activities or farming enterprises which are located within the Cultural Landscape/Values Management Area require a consents as a controlled activity, there needs to be some matters of control included within the plan.	<p>New matters of control as a consequence of the new rule</p> <p><b><u>The exercise of control is restricted to the following matters:</u></b></p> <ol style="list-style-type: none"> <li><u>The quality of, compliance with the Farm Environment Plan;</u></li> </ol>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><u>and</u></p> <p>2. <u>The effects of the activity on Ngāi Tahu Cultural Values; and</u></p> <p>3. <u>Stock exclusion from waterways; and</u></p> <p>4. <u>Whether the farming activity is meeting the nitrogen loss calculation, calculated using the Matrix of Good Management or some alternative method approved by ECan; and</u></p> <p>5. <u>The potential benefits of the activity to the applicant, the community and the environment.</u></p> <p>Any consequential amendments</p>
5.11.7	Support in Part	We support the concepts within Rule 11.5.7. however give the redrafting of Rule 11.5.6 and the new rule proposed, the rule needs to be amended so that it does not apply to farming activities within the Cultural Landscape/Values Management Area or receive water from an irrigation scheme.	<p>Amend Rule 11.5.7 by</p> <p>Deleting Condition (1)</p> <p><del>1. The nitrogen loss calculation for the property does not exceed 15 kg per hectare per annum; or</del></p> <p><b>AND</b></p> <p>Adding a new condition:</p> <p><u>The farming activity is not located within the Cultural Landscape/Values Management Area; and</u></p> <p><b>AND</b></p> <p>Adding a new condition:</p> <p><u>The farming activity is not irrigated with water from an irrigation scheme; and</u></p> <p><b>AND</b></p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p>Amending Condition (4)</p> <p><i>2. The nitrogen loss calculation for the property is greater than 15 kg per hectare per annum and the nitrogen loss calculation for the property farming activity or farm enterprise will not increase above the nitrogen baseline; and</i></p> <p><b>AND</b></p> <p>Deleting condition (4)</p> <p><i>(4) From 1 July 2015, for properties within the Lake Area in the Cultural Landscape/Values Management Area a Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A for all properties greater than 10 hectares.</i></p> <p>Any consequential amendments</p>
11.5.8	Support in Part	<p>We support the use of FMP's as a management tool for addressing water quality issues. However, we are of the option that from 2017 the quality of these need to be assessed and in our view the only way they can be appropriate assessed is via the consenting regime. Therefore in our view Rule 11.5.8 needs to be amended from a permitted activity to an Restricted Discretionary Activity.</p> <p>Further in our view only properties which are large than 50ha in area should need to have an FMP.</p>	<p>Amended Rule 11.5.8</p> <p>So that it is a restricted discretionary activity</p> <p><b><i>From 1 January 2017, the use of land for a farming activity in the Selwyn Waihora catchment is a permitted <u>Restricted Discretionary</u> activity, provided the following conditions are met:</i></b></p> <p><b>AND</b></p> <p>Delete condition 1</p> <p><i>1. The nitrogen loss calculation for the property does not</i></p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><del>exceed 15 kg per hectare per annum; and</del></p> <p><b>AND</b></p> <p>Add a new condition</p> <p><u>The farming activity is greater than 50 hectares in area; and</u></p> <p><b>AND</b></p> <p>Replace Condition 2 with</p> <p><del>2. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A for all properties greater than 10 hectares within the Lake Cultural Landscape/Values Management Area, and supplied to Canterbury Regional Council on request; and</del></p> <p><u>The farming activity is not located within the Cultural Landscape/Values Management Area; and</u></p> <p><b>AND</b></p> <p>Amend Condition 3</p> <p><del>3. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A for all properties greater than 50 hectare, and is supplied to Canterbury Regional Council on request;</del></p> <p><b>AND</b></p> <p>Delete condition 4</p> <p><del>4. For properties less than 50 hectares but greater than 20 hectares:</del></p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p>(a) <del>Until 31 December 2021, the Practices in Schedule 24 are being implemented; and</del></p> <p>(b) <del>From 1 January 2022, a Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A.</del></p> <p><b>AND</b></p> <p>Add a new condition</p> <p><u>The farming activity is not irrigated with water from an irrigation scheme.</u></p> <p>Any consequential amendments</p>
New Rule	Support	To be consistent with the policy direction of progressively implementing FMP's a new rule is required which would require consent for smaller properties from 2020.	<p>New Rule</p> <p><b><u>From 1 January 2020 the use of land for a farming activity in the Selwyn Waihora catchment is a Restricted Discretionary activity, provided the following conditions are met:</u></b></p> <ol style="list-style-type: none"> <li><u>1. The farming activity is greater than 10 hectares but less than 50 hectares in area; and</u></li> <li><u>2. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7;-and</u></li> <li><u>3. The farming activity is not irrigated with water from an irrigation scheme; and</u></li> <li><u>4. The farming activity is not located within the Cultural Landscape/Values Management Area.</u></li> </ol> <p>Any consequential amendments</p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
New Mater of Discretion	Support	As Ngāi Tahu is proposing a number of changes to the status of the rules, matters of discretion are also required as a consequent .	<p>Add new matters of discretion for amended Rule 11.5.8 and new rule</p> <p><b><u>The exercise of discretion is restricted to the following matters:</u></b></p> <ol style="list-style-type: none"> <li>1. <u>The quality of and compliance with the Farm Environment Plan; and</u></li> <li>2. <u>The effects of the activity on Ngāi Tahu Cultural Values; and</u></li> <li>3. <u>Stock exclusion from waterways; and</u></li> <li>4. <u>Whether the farming activity is meeting the nitrogen loss calculation, calculated using the Matrix of Good Management or some alternative method approved by ECan; and</u></li> <li>5. <u>The potential benefits of the activity to the applicant, the community and the environment.</u></li> </ol> <p>Any consequential amendments</p>
11.5.9	Oppose	Given the redrafting of the various rules above, Rule 11.5.9 becomes redundant.	Delete Rule 11.5.9
11.5.10	Support in Part	Support the intention of the rule which is to allow properties to 'band together' to manage their nutrients for a number of reasons. However, in our view controlling this via consent is going to be extremely difficult until the MGM project is finished. Thus, in our view a consistent approach should be taken between farming activities and farming enterprise, whereby they are permitted until 2017 and post 2017 consent is required.	<p>Amend Rule 11.5.10</p> <p>This rule only applies until 2017</p> <p><b><u>Until 1 January 2017 tThe use of land for a farming activity as part of a farming enterprise in the Selwyn Waihora catchment is a discretionary permitted activity, provided the following conditions are met:</u></b></p>



RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><b>AND</b></p> <p><i>Amending Conditions (1) &amp; (2)</i></p> <p>1. A Farm Environment Plan has been prepared in accordance with Schedule 7 <del>Part A</del> and is provided to ECan upon request; and</p> <p>2. The nitrogen loss calculation for the farming enterprise has not increased above the nitrogen baseline; and</p> <p><b>AND</b></p> <p>Adding two new conditions</p> <p><u><i>The farming enterprise is not irrigated with water from an irrigation scheme; and</i></u></p> <p><u><i>The farming enterprise is not located with the Cultural Landscape/Values Management Area.</i></u></p> <p>Any consequential amendments</p>
New Rule	Support	As outlined above, once the MGM project has been completed then farming enterprise should be required to gain consent. This is expected to be post 2017, and as such a new rule is required to achieve this.	<p>Include a new rule</p> <p><b><u><i>From 1 January 2017, the use of land for a farming activity as part of a farming enterprise in the Selwyn Waihora catchment is a discretionary activity, provided the following conditions are met:</i></u></b></p> <p>1. <u><i>The farming enterprise is not located with the Cultural Landscape/Values Management Area; and</i></u></p> <p>2. <u><i>The arming enterprise is not irrigated with water from an</i></u></p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><i>irrigation scheme; and</i></p> <p>3. <i>A Farm Environment Plan has been prepared in accordance with Schedule 7</i></p> <p>Any consequential amendments</p>
11.5.13	Support in Part	We support the intent of the rule which is to ensure that there are no high leaching activities within the catchment. however in our view a more efficient way of achieving this outcome is firstly by prohibiting any activity which is discharging more than the MGM number. And further this should occur before the plan is reviewed.	<p>Amend Rule 11.5.13</p> <p><b><i>From 1 January 2025 2037, the use of land for a farming activity or farming enterprise where the nitrogen loss calculation for the property is greater than <u>that calculated using Matrix of Good Management or 80 kg per hectare per annum, whichever is the lesser, is a prohibited activity.</u></i></b></p> <p>Any consequential amendments</p>
11.5.14	Support in Part	We support this rule and in our view it should cover both the farming activity and farming enterprise.	<p>Amend Rule 11.5.14 by including 'farming enterprise within conditions (1) &amp; (2)</p> <p>1. <i>The <del>property</del> farming activity or farming enterprise is irrigated with water from an irrigation scheme and the discharge is a permitted activity under either Regional Rule 5.61 or Rule 5.62; or</i></p> <p>2. <i>The <del>property</del> farming activity or farming enterprise is irrigated with water from an Irrigation Scheme listed in Table 11(j) and the irrigation scheme holds a discharge consent under Rule 11.5.15.</i></p>
Notification	Oppose	In our view there are matters of discretion which may	Delete notification wording

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
		require the written approval of '3 <sup>rd</sup> ' parties and as such it is inappropriate not to allow applications (where written approvals isn't forthcoming) to proceed down the limited notification route.	Any consequential amendments
11.5.21	Support in Part	In the view of Ngāi Tahu this rule should apply to the whole of the Cultural Landscape/Values Management Area.	Amend 11.5.21 by removing the lake area from Condition (1) <i>The discharge is not within the <del>Lake Area in the Cultural Landscape/Values Management Area</del></i> Any consequential amendments
Amend Rule 5.7, 5.8 and 5.9 of pLWRP	Support	For Ngāi Tahu the upgrading of on-site sewage systems to ensure they meet current NZ standards is of immense importance.	Amend Rules 5.7, 5.8 and 5.9 by adding the following condition: <i>(x) <u>From 1 January 2019 the discharge is located within the Selwyn Te Waihora Catchment and:</u></i> <i>(a) <u>It does not comply with comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 – On-site Domestic Wastewater Management ; or</u></i> <i>(b) <u>It is directly into surface or groundwater.</u></i> Any consequential amendments
New Rule	Support	For Ngāi Tahu the discharge of treated sewage effluent to water is unacceptable and should be phased out by a specific time. To achieve this a new rule needs to be included within the plan.	New Rule <b><i><u>From 1 January 2019 within the Selwyn Te Waihora catchment the discharge of treated sewage sludge, bio-solids from either a community waste water treatment system or a domestic on-site waste water treatment system</u></i></b>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><u>either directly into surface or groundwater or onto land in circumstances where the contaminant may enter water where the on-site systems does not comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 – On-site Domestic Wastewater Management is a prohibited activity.</u></p> <p>Any consequential amendments</p>
New Rule	Support	For Ngāi Tahu the discharge of untreated sewage effluent into water is offensive and should be a prohibited activity. To achieve this a new rule needs to be included within the plan.	<p>New Rule</p> <p><u>Within the Selwyn Te Waihora catchment the discharge of untreated sewage sludge, bio-solids from either a community waste water treatment system or a domestic on-site waste water treatment system directly into surface or groundwater is a prohibited activity.</u></p> <p>Any consequential amendments</p>
11.5.25	Support in Part	Support this rule which aims to provide the ability for community schemes to discharge to land. However, in our view this should only be treated waste effluent .	<p>Amend 11.5.25</p> <p><u>Within the Selwyn Waihora catchment the discharge of any treated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into or onto land, or into or onto land in circumstances where a contaminant may enter water is a discretionary activity where the following conditions are met:</u></p> <p>Any consequential amendments</p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
11.5.26	Support in Part	Support this rule which aims to provide the ability for community schemes to discharge to land. However, in our view this should only be treated waste effluent .	Amend 11.5.26  <b><i>Within the Selwyn Waihora catchment the discharge of any <u>treated</u> wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into or onto land, or into or onto land in circumstances where a contaminant may enter water that does not meet one or more of the conditions in Rule 11.5.25 is a non-complying activity.</i></b>  Any consequential amendments
New Rule	Support	In the view of Ngāi Tahu the discharge of untreated waste effluent to water is inappropriate and as such the discharge of any untreated effluent to surface water should be a prohibited activity.	New Rule  <b><i><u>Within the Selwyn Waihora catchment the discharge of any untreated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in circumstances where a contaminant may enter water is a prohibited activity.</u></i></b>  Any consequential amendments
New Rule	Support	In the view of Ngāi Tahu, the discharge of treated waste effluent directly to water should be phased out. to achieve this a new rule needs to be added to ensure this occurs.	New Rule  <b><i><u>From 2025 within the Selwyn Waihora catchment the discharge of any treated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in</u></i></b>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<b><u>circumstances where a contaminant may enter water is a prohibited activity.</u></b> Any consequential amendments
11.5.32	Support in part	We seek that conditions 1 & 2 be replaced as the way these two conditions are drafted could cause confusion. In our view the 'other' conditions of the rule should apply to take regardless of whether it is 'new ' or a replacement of an existing take.	Replace conditions (1) and (2) with: 1 <u>The proposed take:</u>  (a) <u>In addition to all existing resource consented takes does not result in any exceedance of any of the allocation limits in Table 11 (e), 11 (f) and 11(g); or</u>  (b) <u>Is a replacement of a lawfully established surface or groundwater take for which an application to continue the activity has been made under s124 of the RMA and there is no increase in the proposed rate of take and the annual volume and the proposed annual volume is reasonable for the intended use; and</u>  Any consequential amendments
11.5.32	Support in part	We seek condition 3 to be amended so that for a groundwater permit which has a stream depletion effect greater than 5 L/s it is subject to the flow and allocation regime of the variation.	Amend condition (3)  <u>A surface water or a groundwater take with a <del>direct or high degree of</del> stream depletion effect greater than 5 L/s determined in accordance with Schedule 9, complies with the minimum flow and restriction regime in Tables 11(c) and 11(d); and</u>  Any consequential amendments
11.5.32	Support in part	We seek the additional of a new condition of this rule which requires the inclusion of adaptive management conditions	Add condition  <u>For the replacement of a lawfully established groundwater permit</u>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
		upon renewal of a permit which as contained them in the past.	<u>which has been subject to adaptive management conditions the replacement is subject to adaptive management conditions</u> Any consequential amendments.
11.5.32	Support in part	We seek the addition of a new condition which works in conjunction with nutrient regime. This would see the use of FMP's used to ensure that water is being used as efficiently as possible.	Add condition <u>A Farm Environmental Management Plan has been prepared and implemented in accordance with Schedule 7</u> Any consequential amendments.
11.5.32	Support in part	We seek the inclusion of another matter of discretion when assessing surface water takes. This is the level of compliance with the FMP prepared.	Add another matter of discretion under (6) and (7) <u>The level of compliance with the Farm Environmental Management Plan prepared and implemented in accordance with Schedule 7.</u> Any consequential amendments
11.5.32	Support in part	We seek the matter (7) (v) be amended. Currently the way the matter is drafted could create confusion, and allow for discussion as to whether adaptive management conditions are appropriate upon renewal of such permits. In our view those groundwater permits were granted upon the basis of these adaptive management conditions and as such they should be subject to the them upon renewal, however, they may need to be changed should the water quantity outcomes are not being achieved/	Amend Matter (7) (v) <u>the appropriateness of applying the proposed adaptive management conditions</u> Any consequential amendments
11.5.32	Support in part	We note that the taking and use of water can have impacts upon Ngāi Tahu cultural values, especially where the take and use is located with the Cultural Landscape/Values	Add another matter of discretion <u>The effects of the proposed take and use upon Ngāi Tahu</u>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
		Management Area and as such seek to have this included as a matter of discretion	<u>cultural values</u> Any consequential amendments
11.5.33	Support in part	We understand that as part of the ZIP addendum there is a desire to move surface water permit holders to groundwater which is not connected to a surface waterway. In our view this is better achieved by using the method set out within Schedule 9 of LWPR rather than a depth.	Replace Conditions 4 & 5 with: <u>The proposed groundwater take does not have a direct, high or moderate degree of stream depletion effect determined in accordance with Schedule 9; and</u> Any consequential amendments
11.5.33	Support in part	In our view all water permits should contain an annual volume which is based upon either that set out within Schedule 10 of the pLWRP, or that the applicant can demonstrate that they have used or a certain rate which is based upon soil type and the implementation of 'good' irrigation practices.	Amend Condition 6 as follows: <del>For an irrigation take the</del> <u>The proposed groundwater permit has an annual volume and maximum rate of take that sought has been calculated in accordance with using the 'reasonable use test method 1 in Schedule 10 policy 14; and</u> Any consequential amendments
11.5.33	Support in part	We seek the addition of a new condition which works in conjunction with nutrient regime. This would see the use of FMP's used to ensure that water is being used as efficiently as possible.	Add condition <u>A Farm Environmental Management Plan has been prepared and implemented in accordance with Schedule 7</u> Any consequential amendments.
11.5.33	Support in part	We seek the inclusion of another matter of discretion when assessing surface water takes. This is the level of compliance with the FMP prepared.	Add another matter of discretion <u>The level of compliance with the Farm Environmental Management Plan prepared and implemented in accordance with Schedule 7.</u> Any consequential amendments



RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
11.5.33	Support in part	We note that the taking and use of water can have impacts upon Ngāi Tahu cultural values, especially where the take and use is located with the Cultural Landscape/Values Management Area and as such seek to have this included as a matter of discretion.	Add another matter of discretion <i><u>The effects of the proposed take and use upon Ngāi Tahu cultural values</u></i> Any consequential amendments
Notification	Oppose	In our view there are matters of discretion which may require the written approval of '3 <sup>rd</sup> ' parties and as such it is inappropriate not to allow applications (where written approvals isn't forthcoming) to proceed down the limited notification route.	Delete notification wording Any consequential amendments
11.5.34	Support in Part	We support that where the taking and use of surface and groundwater is unable to meet Rules 11.5.32 or 11.5.33 it should be deemed to be a discretionary activity. However in our view to give effect to the NPS – Freshwater, the rule requires an additional condition where the taking and use should not result in the further over allocation of water.	Amend Rule 11.5.34 by adding two conditions: 1 <i><u>The proposed take in addition to all existing resource consented takes does not result in any exceedance of any of the allocation limits in Table 11 (e), 11 (f) and 11(g); or</u></i> 2 <i><u>The proposed take is a replacement of a lawfully established surface or groundwater take for which an application to continue the activity has been made under s124 of the RMA and there is no increase in the proposed rate of take and the annual volume and the proposed annual volume is reasonable for the intended use.</u></i> Any consequential amendments
11.5.35	Support	In our view there are a number of groundwater permits	Amend Rule 11.5.35 so that where an application which does

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
		which have been granted on the basis of adaptive management conditions. As outlined above and within the policy framework of the plan, these conditions should form part of the application. In our view, where the application is not going to propose/comply with these conditions then it should be deemed to be a non-complying activity.	not comply with the new conditions under Rule 11.5.33 becomes a non-complying activity. Any consequential amendments
11.5.37	Support in Part	We generally support the intent of the rule to control of the transfer of water. In our view, condition (2) needs to be amended so that only water which has physically been used can be transferred and secondly that for surface water transfers, it does not impact upon any downstream users reliability of supply.	Amend Rule 11.5.37 (2) <i><u>In the case of surface water:</u></i> <i><u>(a) the point of take remains within the same surface water catchment; and</u></i> <i><u>(b) the take complies with the minimum flow, flow restrictions and allocation regime in tables 11 (c), 11 (d) and 11 (g) and;</u></i> <i><u>(c) the take does not result in a reduction in the reliability of supply to any other lawfully established surface water permit holder, unless that permit holder has provided their written approval; and</u></i> Any consequential amendments
11.5.37	Support in Part	While we support not allowing the transfer of water 'outside' irrigation schemes, in our view there is some merit in allowing some transfer of water where this occurs within the bounds of the irrigation scheme.	Amend Rule 11.5.37 (3) (d) 3 (d) <i><u>The transfer is not from a person who holds shares in an irrigation scheme to a person who either does not hold irrigation scheme shares or irrigation scheme shares in a different irrigation scheme in the irrigation scheme area as shown on the planning maps; and</u></i>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			Any consequential amendments
11.5.37	Support in Part	In our view another condition needs to be added to ensure that only water which has physically been used can be transferred.	Amend Rule 11.5.37 by adding a new condition: <i><u>In the case of a partial transfer, the combined rate and volume of water being transferred and kept reflects that which can be demonstrated has been used in the past.</u></i> Any consequential amendments
11.5.37	Support in Part	We note that the taking and use of water can have impacts upon Ngāi Tahu cultural values, especially where the take and use is located with the Cultural Landscape/Values Management Area and as such seek to have this included as a matter of discretion.	Add another matter of discretion <i><u>The effects of the proposed take and use upon Ngāi Tahu cultural values</u></i> Any consequential amendments
11.5.37	Support in Part	In our view, a matter of discretion for the transferring of water should be whether sufficient evidence has been provided to show what is being transferred has physically been taken.	Add another matter of discretion <i><u>For a partial transfer whether the combined rate of take and annual volume of the water being transferred and that being kept can be demonstrated as being physically taken in the past.</u></i> Any consequential amendments
11.5.40	Support in Part	Ngāi Tahu are supportive of investigating the use of water to raise groundwater levels within the area. However, in our view there shouldn't be any direct augmentation of the waterways within the catchment.	New Condition <i><u>The discharges is not directly into water</u></i> Any consequential amendments
11.5.43	Support in Part	Ngāi Tahu supports the inclusion of the new condition within Rule 5.163 of the pLWRP. However in our view all	Amend condition (1)

<b>RULES</b>			
<b>Rule</b>	<b>Oppose/ Support (in part or full)</b>	<b>Reasons</b>	<b>I seek the following decisions from Environment Canterbury:</b>
		works undertaken by the local authority within waterways within this catchment should be subject to a drainage management plan.	<u>Where the activity involves the removal of existing vegetation by or on behalf of a local authority within the Cultural Landscape/Values Management Area the activity is undertaken in accordance with a Drainage Management Plan.</u> Any consequential amendments
Table 11 (c) Minimum flows	Support in Part	Ngāi Tahu are supportive of Table 11 (c) which sets out the minimum flows to be imposed upon a number of waterways with the catchment. however, we note that a few minimum flows either do not accurately reflect the ZIP Addendum (e.g. Hamner Road Drain which is set at 250l/s, the rational within the ZIP Addendum is to provide for Ecological and Cultural flows where those flow recommendations are 258l/s and 260l/s respectively) or give effect to the cultural flow recommendations.	Amend Table 11 (c) as follows: <ul style="list-style-type: none"> <li>• Hamner Road Drain increase the minimum flow to 260L/s;</li> <li>• Hororata River increase the minimum flow to 382L/s;</li> <li>• Kaituna River increase the minimum flow to 100L/s;</li> <li>• LII increase the minimum flow to 290l/s</li> <li>• Selwyn River at Whitecliffs increase the minimum flow to 713l/s;</li> <li>• Silver Stream increase the minimum flow to 120l/s.</li> </ul>
Definitions Drainage Management Plan	Support in Part	Ngāi Tahu supports the preparation of drainage management plans which aims to ensure works undertaken to maintain the drainage network is undertaken in a manner which incorporates and addresses the impact of these work upon Ngai Tahu cultural values. In the view of Ngāi Tahu the best way of ensuring that these plans capture all of the matters of importance to Ngāi Tahu is for the definition of drainage management plan to be removed and the matters to be contained within the plan to be incorporated into a	Delete the definition of Drainage Management Plan and include a new schedule within the plan which sets out the matters which the management plan should address.  <b><u>Schedule X</u></b> <b><u>Drainage Management Plans</u></b> <b><u>1. The location of the waterways subject to this plan; and</u></b>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
		<p>new Schedule.</p> <p>In our view this would result in increased consistency within the planning framework as what should be contained within management plans are contained within specific Schedules rather than definitions. By way of example what should be within FPM's is contained within Schedule 7.</p>	<p>2. <u>The works to be covered by this plan (i.e. vegetation removal, sediment removal, bank re-contouring); and</u></p> <p>3. <u>The identification and mitigation of the effects of the proposed works covered by this pla); and</u></p> <p>Any consequential amendments</p>
Schedule 24 Farm Practices	Support in Part	<p>Ngāi Tahu are supportive of Schedule 24 which sets out some farm practices. We understand these farming practices are an interim step until the MGM project is completed. In our view this Schedule should include a number of other matters such as, how MGM can be incorporated, how farming practices should move towards the 'trigger levels', looking at critical source areas for wintering, run-off blocks, how paddocks are selected</p>	<p>Amend Schedule 24 to include:</p> <p><b>(a) Nutrient Management</b></p> <p><i>(iv) <u>Practices to be implemented within defined timeframes to ensure that the nutrient loss is at or below that calculated using the Matrix of Good Management or an alterative method; and</u></i></p> <p><i>(v) <u>Practices to be implemented within defined timeframes to ensure that the nutrient loss is tracking towards the trigger level.</u></i></p> <p><b>(c) Intensive Winter Grazing:</b></p> <p><i>(ii) <u>The use of a 'paddock selection tool' or something similar when determining any paddocks to be used for winter fodder crops; and</u></i></p> <p><i>(iii) <u>Practices to implemented to minimize the loss of sediment from the property, including but not limited to how the paddock is grazed and the use of 'run-off' blocks for wintering.</u></i></p> <p>Any consequential amendments</p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
New Schedule	Support	<p>In the view of Ngāi Tahu, every framing activity and farming enterprise within the rural area should keep sufficient records to enable OVERSEER or an alternative method of nutrient loss calculation to be run.</p> <p>We understand that a number of ‘farmers’ understand the information requirements of OVERSEER, however, we also understand that do not. To ensure that records are kept, the minimum requirements need to be set out within a new schedule.</p>	<p>New Schedule</p> <p><b><i>Schedule X – Information to be kept</i></b></p> <p>(a) <u>The site area to which the farming activity or farming enterprise relates;</u></p> <p>(b) <u>Monthly stocking rates (numbers, types and classes) including breakdown by stock class;</u></p> <p>(c) <u>Annual yield of arable or horticultural produce;</u></p> <p>(d) <u>A description of the farm management practices used on each block including:</u></p> <p>(i) <u>Ground cover – pasture, crops, fodder crops, non-grazed areas (including forestry, riparian and tree areas) and any crop rotation;</u></p> <p>(ii) <u>Stock management – lambing/calving/fawning dates and percentages, any purchases and sales and associated dates, types and age of stock;</u></p> <p>(iii) <u>Fertiliser application – types and quantities per hectare for each identified block, taking into account any crop rotation;</u></p> <p>(iv) <u>Quantities of introduced or exported feed;</u></p> <p>(e) <u>Farm animal effluent, pig farm effluent, feed pad and stand-off pad effluent management including:</u></p> <p>(i) <u>Area of land used for effluent application;</u></p> <p>(ii) <u>Annual nitrogen loading rate and nitrogen load rate per</u></p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><i>application;</i></p> <p><i>(iii) Instantaneous application rate;</i></p> <p><i>(f) Irrigation – areas, rates, monthly volumes and system type.</i></p> <p><u>The information is to be collated for the period 1 July to 30 June in the following year.</u></p> <p>Any consequential amendments</p>
Schedule 7	Support in Part	<p>Ngāi Tahu supports Schedule 7 of the proposed Land and Water Plan along with its use within this sub regional chapter. However, in the view of Ngāi Tahu a number of additional elements need to be incorporated within Schedule 7 to ensure that FMP's prepared within the Selwyn Te Waihora Catchment accurately reflect the intention of both this Zone Committee and this sub regional chapter.</p> <p>As the amendments proposed here would also apply across the region, which may or may not be appropriate, there may be some logic in having a specific schedule within the sub regional plan which clearly sets out what should be contained within the FMP's within this catchment.</p>	<p>Amend Schedule 7 Part B</p> <p>By including the following matters</p> <p><b>OR</b></p> <p>Insert a new Schedule within Selwyn Te Waihora Section which incorporates all matters within the existing Schedule 7 and the following additional matters.</p> <p>Additional matters Part B under “<i>The Plan shall contain as a minimum:...</i>”</p> <p><u>(2) (x) The location of any tracks including any watertables, swales etc. which are used to convey stormwater;</u></p> <p><u>(2) (x) The location of farm infrastructure for example wool sheds, yards, feed pads, dairy shed etc.</u></p> <p><b><u>New Section - Risk Assessment</u></b></p> <p><u>A site specific environmental risk assessment undertaken by an</u></p>

RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><i>independent person, which clearly identifies any risks to the environment from the farming operation and set out measures which could avoid such risks.</i></p> <p><b><u>New Section – Irrigation Management</u></b></p> <p><i><u>A description of how the irrigation system will:</u></i></p> <p>(a) <i><u>All irrigation systems installed or replaced after 1 January 2014 meet the Irrigation New Zealand Piped Irrigation Systems Design Code of Practice [2013], Irrigation New Zealand Piped Irrigation Systems Design Standards [2013] and the Irrigation New Zealand Piped Irrigation Systems Installation Code of Practice [2013].</u></i></p> <p>(b) <i><u>The irrigation system application depth and uniformity are self-checked annually in accordance with the relevant Irrigation NZ Pre-Season Checklist and IRRIG8Quick Irrigation Performance Quick Tests for any irrigation system operating on the property.</u></i></p> <p>(c) <i><u>Irrigation applications are undertaken in accordance with property specific soil moisture monitoring, or a soil water budget, or an irrigation scheduling calculator.</u></i></p> <p>(d) <i><u>Records of irrigation system application depth and uniformity checklists, irrigation applications, soil moisture monitoring or soil water budget or irrigation scheduling calculator results and rainfall are kept and provided to the Canterbury Regional Council upon request.</u></i></p> <p>(5) (a) <i><u>Nutrient management: To maximise nutrient use efficiency while minimising nutrient losses to water Practices to be implemented over a specified timeframe which will ensure that the discharge is not more than the</u></i></p>



RULES			
Rule	Oppose/ Support (in part or full)	Reasons	I seek the following decisions from Environment Canterbury:
			<p><u>nitrogen/phosphorus discharge loss rate as calculated using either the Matrix of Good Management or an alternative method; and practices to be implemented over a specified timeframe which will ensure the discharges are reducing towards achieving a discharge loss of no more than a 15kg/ha/year</u></p> <p><u>(5) (x) Wetlands and riparian management: To manage wetland and waterway margins to avoid damage to the bed and margins of a water body, avoid direct input of nutrients, and to maximise riparian margin nutrient filtering.</u></p> <p><u>(5) (x) On farm land drainage: Identify and implement methods for addressing the effects on water quality from land drainage water;</u></p> <p><u>(5) (x) Stock exclusion from waterways: measures to be implemented to ensure that stock are excluded from all waterways, including, how stock access to intermittently flowing waters will be managed.</u></p> <p><u>(5) (x) Wintering management : To manage the risks of wintering practise to avoid sediment run-off from or increasing nutrient loss as a result of wintering practises.</u></p> <p>Any consequential amendments</p>