

Janel Hau

From: Chris Hansen <chris@rmaexpert.co.nz>
Sent: Monday, 9 June 2014 1:05 p.m.
Subject: Further submission to submissions on Proposed variation 1 to the Proposed Canterbury Land & Water Regional Plan
Attachments: RAV PCLWRP further submission FINAL090614.docx
Categories: Purple Category

Please find attached a further submission by Ravensdown Fertiliser Co-operative Ltd (Ravensdown) (**Submitter ID Number 52249**) on submissions on proposed Variation 1 to the proposed Canterbury Land & Water Regional Plan.

Ravensdown will serve a copy of this further submission on the persons who made the submission the further submission relates to within 5 working days.

Please do not hesitate to contact me if you have any questions.

Regards

Chris Hansen
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FURTHER SUBMISSION ON PROPOSED CANTERBURY LAND & WATER REGIONAL PLAN

(Closing date: Monday 09 June 2014)

To: Chief Executive Officer
Environment Canterbury
P O Box 345,
Christchurch

Further Submission on: Proposed Variation 1 to the Canterbury Land & Water Regional Plan

Name of Submitter: Ravensdown Fertiliser Co-operative Ltd.

Address of Submitter: C/- CHC Ltd
PO Box 51-282
Tawa
WELLINGTON 5249
Attention: Chris Hansen

Phone: 021 026 45 108
Email: Chris@rmaexpert.co.nz

1. A detailed further submission is attached.
2. Ravensdown Fertiliser Co-operative Ltd (Ravensdown) is an organisation who has an interest in the variation that is greater than the interest the general public has.
3. Ravensdown wishes to be heard in support of this further submission.
4. Ravensdown would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.



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Chris Hansen

Authorised Agent of Ravensdown Fertiliser
Co-operative Ltd

09 June 2014

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Date

Submitter ID/Name	Point ID	Plan Provision	Support/ Oppose	Reason
52239 Central Plains Water Ltd	V1pLWRP-366	Policy 11.4.13	Support in part	The submitter seeks the policy to be replaced with a method requiring Council to commit to the development of Good Management Practice nitrogen and phosphorus loss rates for inclusion in the a future plan variation. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP-369	Policy 11.4.14	Support in part	Similar to above, the submitter seeks the policy to be replaced with a method requiring Council to commit a nitrogen reduction strategy for inclusion in a future plan variation. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
53683 Dairy Holdings Ltd	V1pLWRP-1939	Policy 11.4.13	Support in part	The submitter seeks the policy to be replaced with a method requiring Council to commit to the development of Good Management Practice nitrogen and phosphorus loss rates for inclusion in the a future plan variation. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP-1940	Policy 11.4.14	Support in part	Similar to above, the submitter seeks the policy to be replaced with a method requiring Council to commit a nitrogen reduction strategy for inclusion in a future plan variation. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
52333 Fonterra	V1pLWRP-1218	Policy 11.4.6	Support	The submitter seeks a commitment in the plan to keep the nitrogen load limit under review so the appropriate limit is reconsidered once the Good Management Practice nitrogen and phosphorus loss rates have been confirmed. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP-1229	Policy 11.4.12 (a)	Support	The submitter seeks the policy be amended to introduce a Selwyn Te Waihora nitrogen baseline that is defined in the submission. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.

	V1pLWRP-1234	Schedule 24	Neutral	The submitter seeks a new method or advisory note to the effect that Schedule 24 will not apply once the Good Management Practice nitrogen and phosphorus loss rates have been introduced into the Plan. Ravensdown seeks clarification regarding whether the entire Schedule 24 will not apply, as it considers there are matters in Schedule 24 that have merit and should apply after the Good Management Practice nitrogen and phosphorus loss rates have been introduced into the Plan.
	V1pLWRP-1238	Policy 11.4.13	Support	The submitter seeks the policy to be deleted and replaced with a method or advisory note that is a commitment to develop Good Management Practice nitrogen and phosphorus loss rates for inclusion in the Plan and to require compliance with the rates by 1 January 2017. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1239	Policy 11.4.14	Support	The submitter seeks the policy to be deleted and replaced with a method or advisory note as provided in the submission. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1242	Policy 11.4.15	Support	The submitter seeks the policy to be deleted. If the policy is retained, the submitter seeks amendments by adding further matters to be considered when having regard to the extent and pace of reductions in nitrogen loss post 2022. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP-1285; 1277; 1278; 1280; 1281; 1282	Rules 11.5.6 – 11.5.10; Rule 11.5.13 -	Support	The submitter seeks amendments to the rules to introduce the Selwyn Te Waihora nitrogen baseline sought in relation to Policy 11.4.12 (a) above. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1287	Rule 11.5.9	Support	The submitter seeks amendments to the matters of discretion to be consistent with the changes sought to the policies above. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-	Rule 11.5.12	Support	The submitter seeks the rule to be combined with Rule 11.5.11 so that any

	1297			farming activity that does not meet one or more restricted discretionary activity conditions becomes non-complying activity. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
52265 Forest & Bird	V1pLWRP-1251	New Policy 11.4 1 sought	Oppose	The submitter seeks a new Policy 11.4.1 that will provide for progressive review and monitoring of the policies and rules of the Plan through a Plan Change. It is considered such a policy is not necessary as the Council can review the effectiveness and appropriateness of its Plan provisions and introduce a plan change at any time under the RMA.
52292 Beef & Lamb	V1pLWRP- 572	Nitrogen Baseline definition	Support	The submitter seeks amendments to the definition of Nitrogen Baseline, and in particular in (a) amends 'mean' to 'maximum' and add 'in any one year'. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP- 578	Farm Environment Plans	Support	The submitter seeks an amendment so that Farm Environment Plans are required only where there are benefits in managing contaminant loss issues. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP- 579	Rule 11.5.7 4	Support	The submitter seeks for Rule 11.5.4 to provide for Farm Environment Plans to be completed in a reasonable timeframe after the results of the MGM project for Good Management Practice are known. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
52267 Horticulture NZ	V1pLWRP-1544	Policy 11.4.12	Support	<p>The submitter seeks that the nitrogen baseline is based on the highest year between 2009 and 2013 not the rolling average. The request is consistent with Ravensdown submission and represents sound resource management planning practice.</p> <p>The submitter also sought a new policy be added that provides for the nitrogen baseline for a property or enterprise can be reassessed where it can be demonstrated that the 4 years between 2009 and 2013 do not accurately reflect the nature of the operation. Ravensdown cannot find this matter included in the summary of submissions. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.</p>

				practice.
	V1pLWRP-1545	Policy 11.4.13	Support	The submitter seeks an amendment to the policy requiring from 1 January 2017 where farming activities on a property greater than 50 ha to implement a Farm Management Plan in accordance with Schedule 7 Part A. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1403	Policy 11.4.14	Support in part	The submitter seeks the policy to be deleted or amended to take into account revised assessments that are developed through the process to better reflect the impact on jobs and economic development opportunities. Ravensdown supports the requested amendment which is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
52309 Ballance		Entire submission	Support	The submission points raised and relief sought is supported by Ravensdown as they are consistent with its submission and represents sound resource management planning practice.
52318 North Canterbury Federated Farmers	V1pLWRP-862	Definition of Nitrogen Baseline	Support	The submitter seeks amendments to the definition of Nitrogen Baseline, and in particular in (a) amends 'mean' to 'maximum' and add 'in any one year'. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
52271 Dairy NZ	V1pLWRP-1345	Policy 11.4.6	Support	The submitter seeks a commitment in the plan to keep the nitrogen load limit under review so the appropriate limit is reconsidered once the Good Management Practice nitrogen and phosphorus loss rates have been confirmed. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP-1346	Policy 11.4.12(a)	Support	The submitter seeks the policy be amended to introduce a Selwyn Te Waihora nitrogen baseline that is defined in the submission. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-	Schedule 24	Neutral	The submitter seeks a new method or advisory note to the effect that Schedule 24 will not apply once the Good Management Practice nitrogen and phosphorus loss rates have been introduced into the Plan. Ravensdown seeks clarification regarding whether the entire Schedule 24 will not apply,

				as it considers there are matters in Schedule 24 that have merit and should apply after the Good Management Practice nitrogen and phosphorus loss rates have been introduced into the Plan.
	V1pLWRP-1350	Policy 11.4.13	Support	The submitter seeks the policy to be deleted and replaced with a method or advisory note that is a commitment to develop Good Management Practice nitrogen and phosphorus loss rates for inclusion in the Plan and to require compliance with the rates by 1 January 2017. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1351	Policy 11.4.14	Support	The submitter seeks the policy to be deleted and replaced with a method or advisory note as provided in the submission. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1353	Policy 11.4.15	Support	The submitter seeks the policy to be deleted. If the policy is retained, the submitter seeks amendments by adding further matters to be considered when having regard to the extent and pace of reductions in nitrogen loss post 2022. The request is consistent with Ravensdown submission and represents sound resource management planning practice.
	V1pLWRP-1363; 1364; 1365; 1366; 1367; 1368	Rules 11.5.6 – 11.5.10; Rule 11.5.13	Support	The submitter seeks amendments to the rules to introduce the Selwyn Te Waihora nitrogen baseline sought in relation to Policy 11.4.12 (a) above. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1369	Rule 11.5.9	Support	The submitter seeks amendments to the matters of discretion to be consistent with the changes sought to the policies above. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1523	Rule 11.5.12	Support	The submitter seeks the rule to be combined with Rule 11.5.11 so that any farming activity that does not meet one or more restricted discretionary activity conditions becomes non-complying activity. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management

				planning practice.
52310 North Canterbury Fish & Game	V1pLWRP-661;	Additional Policy 11.4.6	Oppose	The submitter seeks a new Policy 11.4.6 be added introducing a range of values important to the submitter. The request is opposed by Ravensdown as it considers the current PCLWRP and Variation 1 is appropriate and meets the purpose of the Resource Management Act (subject to matters raised in its own submission and supported in submissions included in this further submission), and the new policy is unnecessary and inappropriate.
	V1pLWRP-648; 649; 651; 653; 659; 660	Policies 11.4.6 – 11.4.11	Oppose	The submitter seeks the policies to be retained (with the exception of not adopting the targets and limits in Table 11 (i)), and reserves the right to question the appropriateness of the targets and limits in Table 11 (i) and suggest alternatives. Ravensdown opposes the submitter seeking to reserve such a right, as it is considered such a request is not provided for in the submission process included in the Resource Management Act and is therefore not legal.
	V1pLWRP-662; 663; 664	Policies 11.4.12 – 11.4.14	Oppose	Similar to above, the submitter seeks the policies to be retained but retain scope for the submitter to seek further improvements on detailed provisions in these policies. The submitter is required under the Resource Management Act to identify through its submission the resource management issue it is raising, and the relief it seeks. It cannot retain scope to seek further improvements later. Ravensdown opposes the submitter seeking to reserve such a right, as it is considered such a request is not provided for in the submission process included in the Resource Management Act and is therefore not legal.
	V1pLWRP-666	Policy 11.4.15	Oppose	The submitter seeks the policy to be extended to stipulate minimum review periods for individual properties and provide better guidance for consent planners in managing non-performance of individual properties. The request is opposed as the issues raised cannot be addressed until the Good Management Practice nitrogen and phosphorus loss rates for inclusion in the Plan through a plan change process later, as sought by Ravensdown in its submission.
	V1pLWRP-667	Policy 11.4.17	Oppose	The submitter seeks the policy to be retained and reserves the right to question the appropriateness of the targets and limits and suggest alternatives. Ravensdown opposes the submitter seeking to reserve such a right, as it is considered such a request is not provided for in the submission process included in the Resource Management Act and is therefore not legal.

	V1pLWRP-668; 669; 670; 671; 672	Policies 11.4.18 – 11.4.20; Table 11 i and j	Oppose	The submitter seeks the policies be retained, and phosphorus target limits to be added to Table 11 (i), (j) and (k). Ravensdown opposes this request as the phosphorus targets or limits sought are not needed, and the Plan provisions are appropriate as included in Variation 1, subject to amendments sought by Ravensdown through its submission.
52287 Synlait	V1pLWRP-974	Policy 11.4.1	Support	The submitter seeks an amendment to the policy adding the word ' <i>adverse</i> ' before ' <i>cumulative effects</i> ' to make it consistent with the Resource Management Act. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1023	Policy 11.4.12	Support	The submitter seeks a lead in time for the implementation of practices associated with Schedule 24, and the development of a working party to help develop awareness programmes of these practices. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP-1030	Policy 11.4.13	Support	The submitter seeks a robust definition of Good Management Practice and allow for some clear linkages on what these numbers may mean to businesses and communities. The submitter also seeks the MGM work to be completed and nutrient baselines established before the impacts of the policy is assessed. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
	V1pLWRP1161	Policy 11.4.17	Support	The submitter seeks for a lead in time for new irrigation as land owners currently cannot assess the policy against operational requirements as GMP numbers through the MGM project have not been set. The request is considered necessary and appropriate to achieve the purpose of the Resource Management Act, and represents sound resource management planning practice.
51972 FANZ		Entire Submission	Support	The submission points raised and relief sought is supported by Ravensdown as they are consistent with its submission and represents sound resource management planning practice.