

## Gay Gibson

---

**From:** Sarah Drummond  
**Sent:** Tuesday, 1 July 2014 7:30 a.m.  
**To:** Mailroom Mailbox  
**Subject:** TRIM: FW: CHCDOC01-#584583-v1-CPW\_Further\_submissions\_(addendum)  
EMAIL:03711805  
**Attachments:** CHCDOC01-#584583-v1-CPW\_Further\_submissions\_(addendum).pdf  
**Importance:** Low  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged  
**Categories:** Purple Category  
**HP TRIM Record Number:** C14C/124735

[For trimming please](#)

**From:** Customer Services  
**Sent:** Monday, 30 June 2014 4:02 p.m.  
**To:** Sarah Drummond

**EC127598**

**Subject:** FW: CHCDOC01-#584583-v1-CPW\_Further\_submissions\_(addendum) EMAIL:03711805  
**Importance:** Low

----- Original Message -----

**From:** Rakaia River Irrigators Association Inc & CPW & Irrigators  
**Received:** 27/06/2014 3:46 p.m.  
**To:** Drummond, Sarah; Drummond, Sarah; ECInfo; Environment Canterbury; Services, Customer  
**Cc:** Goodfellow, Susan Christina  
**Subject:** CHCDOC01-#584583-v1-CPW\_Further\_submissions\_(addendum)

Hello,

As you are aware we act for Central Plains Water Limited (*CPWL*).

Please find **attached** the short further submission from CPWL in relation to the addendum to the summary of submissions (i.e. the Southbank Dairies and Synlait Milk submissions that were missed previously).

Kind regards,  
Ben

BEN WILLIAMS SENIOR ASSOCIATE  
**CHAPMAN TRIPP** | **D:** +64 3 353 0343 | **M:** +64 27 469 7132  
[www.chapmantripp.com](http://www.chapmantripp.com)

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal professional privilege. If you receive this email in error please immediately notify the sender and delete the email.

**FURTHER SUBMISSIONS IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION  
ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR REGIONAL PLAN**

*Clause 8 of Schedule 1, Resource Management Act 1991*

**To Environment Canterbury**

Variation 1 to the Proposed Canterbury Land and Water Regional Plan  
Freepost 1201  
P O Box 345  
Christchurch 8140

Name of further submitter: Central Plains Water Limited (CPW)

- 1 This is a further submission relating to:
  - the two additional submissions on proposed variation 1 to the proposed Canterbury Land and Water Regional Plan (*Variation 1*) – referred to in the “*Addendum to Summary of Decisions Requested on Variation 1 to the Proposed Canterbury Land & Water Regional Plan*”
- 2 CPW’s further submissions in relation to which CPW either supports, opposes (or both) (along with brief reasons for that support, opposition (or both)) are set out in **Annexure 1**.
- 3 CPW provided an original submission (and earlier further submissions) in relation to Variation 1 and also has an interest greater than the interest of the general public.
- 4 CPW wishes to be heard in support of its further submissions.
- 5 If others make a similar submission, CPW will consider presenting a joint case with them at a hearing.

**Signed** for and on behalf of Central Plains Water Limited by its solicitors and authorised agents Chapman Tripp



---

Jo Appleyard / Ben Williams  
Partner / Senior Associate  
27 June 2014

Address for service of submitter:

Central Plains Water Limited

c/- Ben Williams

Chapman Tripp

PO Box 2510

Christchurch 8041

Email address: [ben.williams@chapmantripp.com](mailto:ben.williams@chapmantripp.com)

## Annexure 1: Specific further submission points<sup>1</sup>

Prov.	Original submitter	Particular parts	Reasons	Support/Oppose
<b>Background/introduction</b>				
11.1a	Synlait Milk Limited 54491	<b>V1pLWRP-2033</b> <b>V1pLWRP-2034</b> (Nutrient loss calculation)	CPW does not have a view on the extent to which the submission V1pLWRP-2033 is within the scope of Variation 1 (noting that Variation 1 did not seek to amend the definition of nitrogen baseline)  To the extent that the definitions are within scope, CPW seeks a definition that allows for the continued development of the consented Central Plains Water Enhancement Scheme. This includes ensuring that the CPW nutrient load is based on the likely average discharge in the catchment (and not the 'balance' of peak nutrient loads over the last period of X years).	Part support/part oppose
11.4.1	Synlait Milk Limited 54491	<b>V1pLWRP-1971</b> (adverse effects)	There will in fact be a number of positive effects following the development of the Central Plains Water Enhancement Scheme. The policy should be focused on adverse effects	Support
Various	Southbank Dairies 54489	<b>V1pLWRP-1990</b> <b>V1pLWRP-1991</b> <b>V1pLWRP-1992</b> (increase from 15kg)	CPW opposes any change to the nitrogen baseline to the extent it might result in a reduction of N allocation to the Central Plains Water Enhancement Scheme	Oppose in part

<sup>1</sup> Please note that the summary included in column 3 ("Particular parts") and the reasons provided in column 4 ("Reasons") are provided for ease of reference and for the purposes of informing CPW's position. In no context should either be read as strictly limiting or confining the specific further submission points.

<b>Prov.</b>	<b>Original submitter</b>	<b>Particular parts</b>	<b>Reasons</b>	<b>Support/Oppose</b>
Various	Southbank Dairies 54489	<b>V1pLWRP-2010</b> <b>V1pLWRP-2009</b> <b>V1pLWRP-011</b> (method re good management practice nitrogen loss rates)	This is consistent with CPW's concerns around ensuring Variation 1 includes provisions supporting a review following the completion of the Matrix of Good Management Practice Project.	Support
Various	Synlait Milk Limited 54491	<b>V1pLWRP-1974</b> (good management practices)	CPW agrees with the concerns as set out	Support
Various	Southbank Dairies 54489	<b>V1pLWRP-1994</b> <b>V1pLWRP-2003</b> (transfers)	CPW acknowledges the benefits of farming enterprises but notes that care needs to be taken in respect of any farming enterprise regime to ensure that it is not, for example, used as a mechanism to manage or transfer existing nutrients contrary to the Scheme requirements or from land irrigated by CPW water to land that is not irrigated by CPW (to the detriment of the allocation of N to the scheme).	Part support/part oppose
11.4.26	Synlait Milk Limited 54491	<b>V1pLWRP-2020</b> <b>V1pLWRP-2021</b> (9 in 10)	CPW supports provision being made for 9 out of 10 year reliability.	Support