

Gay Gibson

From: Chris Hansen <chris@rmaexpert.co.nz>
Sent: Friday, 24 October 2014 2:52 p.m.
Subject: Submission on Variation 2 to the proposed Land & Water Regional Plan
Attachments: Ravensdown Submission - Var 2 CLWRP - FINAL 241014 (2).doc

Categories: Purple Category

Please find attached a submission on behalf of Ravensdown Fertiliser Co-operative Ltd to Variation 2 to the proposed L&WRP relating to the Hinds/Hekeao Plains Area.

Please contact me if you have any questions.

Regards

Chris

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SUBMISSION ON PROPOSED VARIATION 2 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN

To: Chief Executive Officer
Environment Canterbury
P O Box 345,
Christchurch 8140

Submission on: Proposed Variation 2 to the Proposed Canterbury
Land & Water Regional Plan (PCLWRP)

Name of Submitter: Ravensdown Fertiliser Co-operative Limited
PO Box 1049
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1. The specific provisions of the proposed plan change that Ravensdown's submission relates to are:

Proposed Variation 2 to the Proposed Canterbury Land & Water Plan as included in the attached submission below.

2. Trade Competition

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

3. Ravensdown's submission is:

Refer to submission points below. The relief sought by Ravensdown are also outlined in the submission points below.

4. Ravensdown wishes to be heard in support of this submission.

Ravensdown would be prepared to present a joint case with others that have made similar submissions at a hearing.



.....
Chris Hansen
Authorised Agent for Ravensdown Fertiliser
Co-operative Ltd
24 October 2014

SUBMISSION ON PROPOSED VARIATION 1 TO THE PROPOSED CANTERBURY LAND & WATER REGIONAL PLAN

1 Ravensdown's interest in the Canterbury Region

The following submission is made on behalf of Ravensdown Fertiliser Co-operative Ltd (Ravensdown) to Proposed Variation 2 to the Proposed Canterbury Land & Water Regional Plan (PCLWRP). The period for submission closes on 24 October 2014.

Ravensdown owns and operates three fertiliser-manufacturing plants in Ravensbourne (Dunedin), Hornby (Christchurch) and Awatoto (Napier). Ravensdown also operates 46 bulk fertiliser stores throughout NZ, and has an interest in a further 70 consignment fertiliser stores which are operated by third parties in which Ravensdown products are stored.

In addition to these facilities, Ravensdown operates a number of quarries that mine and process agriculture lime in various parts of New Zealand.

Ravensdown takes an interest in regional and district plans from two perspectives – how plan provisions affect their own manufacture and storage activities, and how the plan provisions may affect the users of their products. When considering plans Ravensdown wishes to ensure planning provisions are enabling and are not unduly restrictive.

In this context, Ravensdown is mindful that the purpose of the Resource Management Act 1991 (RMA) is to promote the sustainable management of natural and physical resources, while achieving a number of outcomes, including avoiding, remedying or mitigating the actual or potential adverse environmental effects of an activity. Ravensdown therefore seeks for policies and plans to recognise that the RMA enables activities and anticipates environmental effects will occur, so long as these effects are managed to levels considered acceptable by the community. The RMA does not anticipate no development or zero effects from activities.

2 General Comment on Variation 2 to the Proposed Plan

Ravensdown has had a close involvement in the preparation of the Proposed Canterbury Land & Water Regional Plan (PCLWRP), and has more recently followed the Zone Committee process for the preparation of provisions to be included (through Variation 2) in the Sub-regional Section 13 of the PCLWRP which relates specifically to the Hinds/Hekeao Plains Area. Ravensdown generally supports the direction and findings of the Zone Committee, and the outcomes sought included in the "*Ashburton ZIP Addendum; March 2014*".

In particular, Ravensdown generally supports the following parts of Variation 2:

- The overall approach to management of Phosphorus in the Hinds/Hekeao Plains Area;
- The relatively simple policy and rule regime proposed;

- The provision of land use change or land use intensification in 30,000ha in the Lower Hinds/Hekeao Plains Area;
- The differentiation of water quality status and the need for different management regimes for the upper and lower Hinds/Hekeao Plains Area.

For the preparation of this submission Ravensdown has also reviewed the Section 32 Evaluation Report (September 2014). While overall it supports the intent of Variation 2 to the PCLWRP, there are a number of matters relating to the provisions of Variation 2 that it wishes to address through this submission.

Of particular interest are the following matters:

- The timing of Variation 2 when the findings of the Matrix for Good Management (MGM) Project are yet to be released;
- The use of the nitrogen baseline as a ‘backstop’;
- The Baseline Land Use definition;
- Whether the Good Management Practice (GMP) numbers and the proposed reductions in nitrogen will achieve the 3,400 tonne load limit in the lower Hinds/Hekeao Plains Area by 2035;
- The basis for the load limits included in Table 3-2 (page 22 of s.32 Report);
- Consistency of rules with the proposed Canterbury Land & Water Regional Plan;
- Wording of key policies;
- The use of Prohibited Activity status;
- Table 13 (g) and (h) provisions;
- Schedule 24a provisions.

3 General Submission Points

Ravensdown has assessed Variation 2 and wishes to raise the following ‘General Matters’ that apply to a number of provisions or are matters that raise questions that require some consideration.

Matrix of Good Management (MGM) Project

Ravensdown is aware of and supports Environment Canterbury (the Council) and the Primary Sector Industry undertaking the Matrix for Good Management (MGM) Project to define nitrogen and phosphorus losses under Good Management Practice (GMP). Ravensdown understands that the results from the MGM Project will be available in mid-2015. These results will allow the farmer to assess and compare nitrogen and phosphorus losses under agreed GMP and will allow Council to have the ability to assess compliance at a farm and at a Catchment scale.

Notwithstanding this support for the MGM Project, Ravensdown questions the timing of Variation 2 which requires dairy and dairy support farms to meet the MGM values for nitrogen loss, and then requiring further reductions beyond GMP, when the MGM Project has

not been completed and therefore there are no nitrogen loss rates to compare a farms performance with. From this perspective, Variation 2 is pre-mature as the achievement of the required outcomes in the Hinds/Hekeao Plains Area will highly depend on dairy and dairy support farms meeting GMP for nitrogen loss and then going beyond GMP. It is also noted that *other farming activities* are included in Table 13(g) but there is no % reductions listed at this stage, and it is not clear if Council intends to include % reductions in the future (presumably by way of a plan change). All farming activities are required to operate at GMP to maintain current phosphorus losses.

It would make more sense to Ravensdown for Variation 2 to be introduced after the MGM numbers are ready to be included in the Ashburton sub-regional chapter, which would be mid-2015. If Council was to withdraw Variation 2 until the MGM numbers are available, the PCLWRP provisions would apply until then. In Ravensdown's view, these provisions provide adequate control of land uses, and are similar to the proposed nutrient management framework, in that a farm's nitrogen losses cannot exceed their 2009-2013 Baseline. It is also noted that (in general) the PCLWRP threshold is 20kg N which is the same as the Hinds/Hekeao Plains Area threshold. This seems a sensible and practicable interim solution.

If Council is of the mind to continue with Variation 2 in the absence of the GMP nitrogen loss numbers, Ravensdown considers that Variation 2 should provide clarity on how the MGM numbers will be incorporated into the PCLWRP (presumably in accordance with Policy 4.11 of the PCLWRP), and assumes that a further plan variation or change will be required.

In addition to the above, Ravensdown also raises issues with Policy 13.4.13 including GMP nitrogen loss rates later in this submission. Ravensdown seeks for the removal of any reference to the GMP nitrogen loss rates until they are available.

Ravensdown would seek:

- Council to withdraw Variation 2 until such time as the MGM Project numbers are available and re-notify the Variation at that point;
- If Council does not accept the above request and proceeds with Variation 2, include a note or reference in a policy outlining that Council will introduce into the PCLWRP by variation or plan change the MGM numbers for the primary sectors once available in mid-2015 in accordance with Policy 4.11 of the PCLWRP;
- Remove from Policy 13.4.13 reference to GMP nitrogen loss rates, as sought later in this submission.

Use of Nitrogen Baseline as a 'Backstop' Measure

Ravensdown is concerned there seems to be a 'disconnect' between the Nitrogen Baseline; Policy 13.4.13 and Rules 13.5.9 – 13.5.12 and Rules 13.5.15 – 13.5.20. In particular Ravensdown understood that the purpose of the Nitrogen Baseline was to provide a benchmark for farms to be measured against, but the focus was on MGM numbers to be introduced for the different sectors, and the GMP be implemented to achieve the MGM numbers.

Ravensdown notes Policy 13.4.13 address nitrogen losses in the lower Hinds/Hekeao Plains Area to first meet the GMP rates from 1 January 2017 and then to go beyond GMP from 1 January 2020 in accordance with the requirements of Table 13(h). Presuming that the GMP nitrogen loss rates are included by 1 January 2017 (given Policy 13.4.13), then under Rule 13.5.17 farming activities in the lower Hinds/Hekeao Plains Area that lose over 20 kg N/ha/yr will need to meet the GMP nitrogen loss rates (as listed in Policy 13.4.13(a)) from 1 January 2017.

However, Ravensdown notes that Condition 2 of Rule 13.5.17 states that the use of land for a farming activity is a restricted discretionary activity if the nitrogen loss calculation exceeds the Nitrogen Baseline, and the matters of discretion for this rule include the GMP nitrogen loss rates that are required from 1 January 2017.

Ravensdown considers the policies imply that the Nitrogen Baseline is not important [in fact the policies do not even reference the Nitrogen Baseline] from 1 January 2017 as the GMP loss rates will take over from this date, but then the rules dictate that the use of land for farming activities, even after the GMP nitrogen loss rates are introduced, will have to comply with their Nitrogen Baseline irrespective of what GMP dictates.

In fact, Ravensdown considers the Nitrogen Baseline is used as a ‘backstop’ in the rules, as any exceedence of the Nitrogen Baseline is a prohibited activity. This seems contrary to the intention of the Policy 13.4.13 that promotes the use of GMP without any indication at all that the Nitrogen Baseline cannot be exceeded.

Ravensdown would seek for Council to:

- Clarify its intention to rely of GMP nitrogen loss rate calculations as the means to achieve the water quality outcomes sought; and
- Change the activity status that apply to the use of land for farming activities that exceed the Nitrogen Baseline after 1 January 2017 from Prohibited to Non-complying; and
- Amend Policy 13.4.13 to address how the Nitrogen Baseline will be considered.

4 Specific Submission Points

Plan Provision: Introductory Section (Page 1/2)

Before heading 13.1 on Page 13-2 insert the following text:

“The Hinds/Hekeao Plains Area consists of the Hinds River/Hekeao catchment, and the plains between the Rangitata and Hakatere/Ashburton Rivers. The Upper Hinds/Hekeao Area includes the foothills and basins that drain into the north and south branches of the Hinds River/Hekeao. The Lower Hinds/Hekeao Plains Area contains the middle and lower reaches of the Hinds River/Hekeao as it flows out across the Canterbury Plains and contains more than 30 spring-fed lowland water bodies by the coast. Many of the water bodies in the Lower Hinds/Hekeao Plans Area are the remnants of what was once an expansive wetland.”

“The Solutions Package requires a 45 percent reduction in nitrogen losses from farming activities in the Lower Hinds/Hekeao Plains Area by 2035. All farming activities are to operate at good management practice by 2017. Dairy and dairy support farms are then required to further reduce nitrogen loss rates by 45 and 25 percent respectively, by 2035. Change in land use or land use intensification is provided for on a maximum of 30,000ha provided the nitrogen loss is no more than 27 kilograms of nitrogen per hectare per annum.”

Submission: Ravensdown supports the dividing of the Hinds/Hekeao Plains Area into the upper and lower areas and the separate provisions included in Variation 2 for these two areas as described in the first paragraph above.

Ravensdown has concerns relating to the requirement for all farming activities (which is not defined) to operate good management practice by 2017 when the MGM Project findings have yet to be released. This concern has been discussed above.

Ravensdown supports the change in land use or land use intensification provisions for a maximum of 30,000 ha. However, Ravensdown does not support the setting of a maximum nitrogen loss rate of no more than 27 kg/N/ha/yr. Ravensdown opposes the setting of this maximum nitrogen loss rate as the GMP nitrogen loss rate is yet to be determined and the 27 kg/N/ha/yr may be unnecessarily restrictive on land use opportunities.

Relief Sought: Ravensdown seeks for Council to:

- Retain the current approach in Variation 2 to divide the Hinds/Hekeao Plains Area into the upper and lower areas and retain the separate provisions included in Variation 2 for these two areas;
- Address the issues relating to adopting good management practice by 2017 when the findings of the MGM Project are yet to be released;
- Retain the intention of the change in land use or land use intensification provisions for a maximum of 30,000 ha;
- Delete the maximum nitrogen loss rate of no more than 27 kg/N/ha/yr and replace it with a commitment to confirm the appropriate GMP nitrogen loss rate once the findings of the MGM Project are available.

Plan Provisions: (New Heading) 13.1A Definitions (Page 2/3)

“Baseline land use - means the land use, or uses, on a property between 1 July 2009 and 30 June 2013 used to determine a property’s ‘nitrogen baseline’ as defined in section 2.9 of this Plan.”

“Good Management Practice Nitrogen Loss Rates - means nitrogen loss rates (in kilograms per hectare per annum) from a property to water for different soils, rainfall and farm type operating at good management practice.”

Submission: Ravensdown wishes to make the following comments on the definitions above, and seeks a new definition of *'farming activity'*.

'Baseline Land Use'

Ravensdown is unclear what the definition is trying to describe, and whether the definition is required or appropriate. Ravensdown understands the MGM Project partners themselves may not have yet defined this matter, and it describes the MGM numbers that are yet to be determined. It may be more appropriate to introduce such a definition after it has been defined by the MGM Project partners and with the MGM numbers, if it is required at that stage.

In addition, Ravensdown is concerned how the Baseline Land Use is being used in Policy 13.4.13 and opposes the approach included in that policy, as discussed further below.

Ravensdown therefore considers the term is inappropriate, unclear and unnecessary, and should be deleted.

'Good Management Practice Nitrogen Loss Rates'

While Ravensdown supports having a definition of *Good Management Practice Loss Rates*, the current definition does not specify the mechanism by which the rate is to be determined – will it be by OVERSEER® or some other mechanism? Ravensdown seeks clarity on this matter in the definition.

'Farming Activity'

Ravensdown notes the policies and rules included in Variation 2 only differentiate between dairy and dairy support and *farming activities*. There is an assumption that a farm will only be one activity, whereas in reality a farm may have a mix of pastoral, arable, dairy etc. Ravensdown considers there are practical and legal (RMA) implications for Council implementing Variation 2. Ravensdown considers a definition of *'farming activity'* would assist with these concerns. Suggested definitions would be:

“farming activity means the use of land for the production of primary products including agricultural, pastoral, horticultural and forestry products.”

Relief Sought: In relation to the definitions, Ravensdown seeks for Council to:

- Delete the definition *'Baseline Land Use'*;
- Amend the definition of *'Good Management Practice Nitrogen Loss Rates'* to read: *““means nitrogen loss rates (in kilograms per hectare per annum) from a property ~~to~~ water as modelled with OVERSEER™, or equivalent model approved by the Chief Executive of Environment Canterbury for different soils, rainfall and farm type operating at good management practice.”;*
- Introduce a new definition *'farming activity'*.

Plan Provision: Policy 13.4.9 (c) (page 4)

“13.4.9 Improve the overall water quality in the Hinds/Hekeao Plains Area by:

(c) restricting increases in nitrogen losses in the Upper Hinds/Hekeao Plains Area; and...”

Submission: While overall Ravensdown supports the intent of the policy to improve the overall water quality in the Hinds/Hekeao Plains Area, it is concerned that the intent in (c) is to restrict activities rather than control effects. Ravensdown considers it is more appropriate and more consistent with s.30 of the RMA if the policy intended to control increases in nitrogen losses.

Relief Sought: Ravensdown seeks council to:

- Amend Policy 13.4.9 (c) by replacing the term ‘*restricting*’ with the term ‘*controlling*’ to be consistent with s.30 of the RMA

Plan Provision: Policy 13.4.10 (Page 4)

“13.4.10 Reduce discharges of microbes, phosphorus and sediments in the Hinds/Hekeao Plains Area by:

(a) excluding intensively farmed stock from drains in addition to the region-wide stock exclusion rules; and

(b) implementing the farm practices in Schedule 24a; or

(c) preparing and implementing Farm Environment Plans.”

Submission: While Ravensdown has some specific points to make regarding Schedule 24a, it overall supports the direction and intent of Policy 13.4.10 in regards to the management of phosphorus.

Relief Sought: Ravensdown seeks Council to retain the intent of Policy 13.4.10 in regards to the management of phosphorus.

Plan Provision: Policy 13.4.11 (Page 4)

“13.4.11 Maintain water quality in the Upper Hinds/Hekeao Plains Area by capping discharges of nitrogen at 114 tonnes of nitrogen per year and requiring all farming activities to operate at good management practice to maintain current phosphorus losses.”

Submission: While Ravensdown supports the overall intent of the policy to maintain water quality in the Upper Hinds/Hekeao Plains Area, it considers the policy should be consistent with other Variation 2 provisions and reference nitrogen losses (rather than discharges). Ravensdown also considers nitrogen losses should be ‘*controlled*’ rather than ‘*capped*’, and phosphorus loss should be controlled through GMP, which may be required to maintain at the current loss levels.

In addition, there is no basis for how the 114 tonnes of nitrogen for the Upper Hinds/Hekeao Plains Area was determined in the s.32 Report. The commentary in the sections around the

Table 3-2 (Page 22 of the s.32 Report) makes no mention of the source of this information. The s.32 Report and Variation 2 mention managing diffuse nutrient losses over a staged timeframe towards the 114 tonnes of nitrogen identified for the Upper Hinds/Hekeao Plains Area, but there appears to be no reasoning for determining this load.

Relief Sought: Ravensdown seeks for Council to:

- Amend Policy 13.4.11 to read (or similar wording):
“13.4.11 Maintain water quality in the Upper Hinds/Hekeao Plains Area by ~~eapping~~ controlling discharges of nitrogen losses at 114 tonnes of nitrogen per year and requiring all farming activities to operate at good management practice to ~~maintain current control~~ control phosphorus losses.”
- Clarify how the 114 tonnes of nitrogen load for the Upper Hinds/Hekeao Plains Area was determined.

Plan Provision: Policy 13.4.12 (Page 4)

“13.4.12 Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen from farming activities to achieve a target load of 3,400 tonnes of nitrogen per year by 2035.”

Submission: Similar to above, while Ravensdown supports the overall intent of the policy to improve water quality in the Lower Hinds/Hekeao Plains Area, it considers the policy should be consistent with other Variation 2 provisions and reference nitrogen losses (rather than discharges).

As with the nitrogen load identified for the Upper Hinds/Hekeao Plains Area, there is no basis for how the 3,400 tonnes of nitrogen for the Lower Hinds/Hekeao Plains Area was determined in the s.32 Report. The commentary in the sections around the Table 3-2 (Page 22 of the s.32 Report) makes no mention of the source of this information. The s.32 Report and Variation 2 mention managing diffuse nutrient losses over a staged timeframe towards the 3,400 tonnes of nitrogen identified for the Lower Hinds/Hekeao Plains Area, but there appears to be no reasoning for determining this load.

In addition, while Ravensdown supports the setting of a load limit with what would appear to be realistic staged timeframes as required by the NPS Freshwater Management, Ravensdown is not convinced that the % reductions set will actually achieve target load. As discussed above, this is because the findings of the MGM Project are yet to be released and therefore the GMP numbers are not known. It is unclear to Ravensdown how there is certainty that a 3,400 tonne N load will be achieved by 2035 through the % reductions required on a GMP number that is not yet set.

Such uncertainty is the reason why Ravensdown considers the provisions of Variation 2 should be delayed until the findings of the MGM Project are known.

Relief Sought: Ravensdown seeks Council to revisit the introduction of Variation 2 until after the findings of the MGM Project are known. Should Council decide to continue with Variation 2, Ravensdown seeks for Council to:

- Amend Policy 13.4.12 to read (or similar wording): “13.4.12 Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the ~~discharge of nitrogen~~ losses from farming activities to achieve a target load of 3,400 tonnes of nitrogen per year by 2035.”
- Clarify how the 3,400 tonnes of nitrogen load for the Lower Hinds/Hekeao Plains Area was determined.
- Make a commitment (perhaps through a Note associated with the policy) to revisit the % reductions proposed in Table 13 (h) to determine whether the 3,400 tonne N load can be achieved once the findings of the MGM Project are known (refer to submission on Table 13 (h) below).

Plan Provision: Policy 13.4.13 (Page 4)

“13.4.13 Farming activities including farming enterprises in the Lower Hinds/Hekeao Plains Area, whether or not they are supplied with water by an irrigation scheme or a principal water supplier, achieve a target load of 3,400 tonnes of nitrogen per year by:

- (a) requiring existing farming activities to meet good management practice nitrogen loss rates from 1 January 2017, calculated on the baseline land uses;*
- (b) requiring further reductions for dairy farming and dairy support from 1 January 2020, in accordance with Table 13(h); and*
- (c) enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000 hectares of land, provided the nitrogen loss calculation is limited to no more than 27 kg per hectare per year.”*

Submission: In relation to Policy 13.4.13 (a), as discussed above, Ravensdown opposes the *baseline land use* component of this policy. There are two issues that relate to this point. Firstly, as written the policy implies that the GMP N loss rates are required to be complied with from 1 January 2017 are based on the 2009-13 land uses, not land use activity at the time (i.e. after 2017). Ravensdown understands that the baseline land use term was simply for determining the nitrogen baseline losses from 2009-13 to give a benchmark that cannot be exceeded. However, it now seems that the ‘target’ is based on historical land uses and not what is actually occurring on the land.

Secondly and following on from above, the term ‘*baseline land use*’ means the land use or uses on a property from 2009-2013 used to determine the nitrogen baseline, and not the losses or effects which is what the policy should be concentrating on. Ravensdown notes that the definition specifies the use, not the N losses (or effects). Ravensdown therefore considers that this policy then specifies that the GMP nitrogen loss rates are calculated on the ‘*baseline land uses*’ which means the activities from 2009-2013 rather than the losses from those activities operating after 2017. This is confusing as the definition of GMP nitrogen loss rates states the rates are for farms operating at GMP.

In relation to Policy 13.4.13 (b), Ravensdown notes the policy targets a specific land use activity (dairy farming and dairy support) rather than addressing nutrient loss. This approach is opposed by Ravensdown.

Furthermore, Ravensdown notes the policy specifies percentage reductions beyond Good Management Practice nitrogen loss rates, when the nitrogen losses provided by Good Management Practice are yet to be determined.

Ravensdown considers appropriate and equitable nitrogen loss reductions should only be determined after the establishment of Good Management Practice Nitrogen loss values through the MGM Project. Only then is the community in a position to evaluate the cost: benefits of N loss reduction required.

In relation to Policy 13.4.13 (c), Ravensdown notes the policy provides for land use intensification or change in land use on a maximum of 30,000 ha of land provided the nitrogen loss calculation is limited to 27 kg/N/ha/yr. Ravensdown supports the provision for land use intensification or change in land use on a maximum of 30,000 ha of land. In relation to allocation of a cap of 27 kg/N/ha/yr, Ravensdown opposes the setting of this cap as the GMP nitrogen loss rate is yet to be determined and the 27 kg/N/ha/yr may be unnecessarily restrictive on land use opportunities.

Relief Sought: Ravensdown seeks Council to:

- Delete the reference to *Baseline Land Uses* in Policy 13.4.13 (a);
- Delete Policy 13.4.13 (b) and Table 13 (h);
- Should Table 13 (h) be retained, make a commitment (perhaps through a Note associated with the policy) to revisit the % reductions proposed in Table 13 (h) to determine whether the 3,400 tonne N load can be achieved once GMP nitrogen loss values are established through the MGM Project;
- Delete reference to the allocation cap of 27 kg/N/ha/yr;
- Amend Policy 13.4.13 (c) to read as follows (or similar wording): “(c) *enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000 hectares of land, provided the additional nitrogen load loss calculation is limited to no more than 27 kg per hectare as a percentage of overall Good Management Practice nitrogen loss rate once known.*”

Plan Provision: Rule 13.5.8 (Page 6) and Rule 13.5.13 (Page 7)

“13.5.8 *Despite any of Rules 13.5.9 to 13.5.12 the use of land for a farming activity in the Upper Hinds/Hekeao Plains Area is a permitted activity provided the following conditions are met:*

1. *The property is less than 5 hectares; and*
2. *The nitrogen loss calculation for the property does not exceed 20 kg per hectare per annum or the nitrogen baseline, whichever is the greater.*”

“13.5.13 Despite any of Rules 13.5.15 to 13.5.20 the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a permitted activity provided the following conditions are met:

- 1. The property is less than 5 hectares; and*
- 2. The nitrogen loss calculation for the property does not exceed 20 kg per hectare per annum or the nitrogen baseline, whichever is the greater.”*

Submission: While overall Ravensdown supports the permitted activity status provided in Rules 13.5.8 and 13.5.13, the approach in these rules is contrary to the approach in the PCLWRP Rule 5.41 which states the property is less than 5 hectares OR the nitrogen loss calculation for the property does not exceed 20 kg per hectare per annum or the nitrogen baseline.

Relief Sought: Ravensdown seeks for Council to amend Rules 13.5.8 and 13.5.13 to read (or similar wording):

“13.5.8 Despite any of Rules 13.5.9 to 13.5.12 the use of land for a farming activity in the Upper Hinds/Hekeao Plains Area is a permitted activity provided the following conditions are met:

- 3. The property is less than 5 hectares; ~~and~~ or*
- 4. The nitrogen loss calculation for the property does not exceed 20 kg per hectare per annum or the nitrogen baseline, whichever is the greater.”*

“13.5.13 Despite any of Rules 13.5.15 to 13.5.20 the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a permitted activity provided the following conditions are met:

- 3. The property is less than 5 hectares; ~~and~~ or*

The nitrogen loss calculation for the property does not exceed 20 kg per hectare per annum or the nitrogen baseline, whichever is the greater.”

Plan Provision: Rules 13.5.9 and 13.5.10 (Page 7)

“13.5.9 The use of land for a farming activity in the Upper Hinds/Hekeao Plains Area is a permitted activity, provided the following conditions are met:

- 1. The nitrogen loss calculation for the property does not increase above the nitrogen baseline; and either*
- 2. The practices in Schedule 24a are being implemented and the information required is recorded in accordance with Schedule 24a, and supplied to the Canterbury Regional Council on request; or*
- 3. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A, and supplied to Canterbury Regional Council on request.*

13.5.10 The use of land for a farming activity as part of a farming enterprise in the Upper Hinds/Hekeao Plains Area is a discretionary activity, provided the following conditions are met:

- 1. The nitrogen loss calculation for the farming enterprise does not increase above the nitrogen baseline; and*
- 2. The farming enterprise is solely in the Upper Hinds/Hekeao Plains Area; and*
- 3. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A.”*

Submission: Ravensdown notes that Rule 13.5.9 provides for the use of land for a farming activity in the Upper Hinds/Hekeao Plains Area as a permitted activity, whereas Rule 13.5.10 requires that a farming activity which is part of a farming enterprise gain a discretionary activity consent.

The matters to be considered relate to nutrient loss factors and there is no apparent reason why a farming activity that is part of a farming enterprise cannot be considered a permitted activity under Rule 13.5.9 to provide on-going business investment and certainty. Ravensdown considers that Rule 13.5.9 should apply to both a farming activity and a farming activity that is part of a farm enterprise, and Rule 13.5.10 should be deleted.

Relief Sought: Ravensdown seeks Council to:

- Amend Rule 13.5.9 as follows (or similar wording):

“13.5.9 The use of land for a farming activity or a farming activity that is part of a farming enterprise in the Upper Hinds/Hekeao Plains Area is a permitted ~~discretionary~~ activity, provided the following conditions are met: ...”

- Delete Rule 13.5.10 and renumber the rule that follow accordingly.

Plan Provision: Rule 13.5.11 (Page 7)

“13.5.11 The use of land for a farming activity that does not comply with conditions 2 or 3 of Rule 13.5.9 or condition 3 of Rule 13.5.10 is a non-complying activity.”

Submission: Ravensdown notes that Rule 13.5.11 requires that activities which cannot comply with conditions 2 or 3 of Rule 13.5.9 or condition 3 of Rule 13.5.10 are non-complying activities. Ravensdown does not consider non-compliance with the stated conditions in Rules 13.5.9 or 13.5.10 (which Ravensdown seeks to be deleted above) would have adverse environmental effects or be contrary to the objectives and policies of the proposed Variation that would warrant non-complying activity status.

Ravensdown considers restricted discretionary activity status would appropriately provide for those activities that do not comply with the stated conditions, which discretion restricted to matters specifically related to nutrient management and achieving the catchment load.

Relief Sought: Ravensdown seeks for Council to amend Rule 13.5.11 as follows (or similar wording):

“Amend Rule 13.5.11 as follows:

13.5.11 The use of land for a farming activity that does not comply with conditions 2 or 3 of Rule 13.5.9 ~~or condition 3 of Rule 13.5.10~~ is a restricted discretionary non-complying activity.

Matters for discretion relate to nutrient management and the catchment load, including:

- 1. The quality of, compliance with and auditing of the Farm Environment Plan; and*
- 2. The ability to meet the nitrogen load target for farming activities in Table 13 (g); and*
- 3. From 1 January 2017 the Good Management Practice Nitrogen Loss Rates to be applied - these Good Management Nitrogen Loss Rates are calculated based on for the baseline land uses; and*
- 4. The potential benefits of the activity to the applicant, the community and the environment.”*

Plan Provision: Rule 13.5.12 (Page 7)

“13.5.12 The use of land for a farming activity that does not comply with condition 1 of Rule 13.5.9 or condition 1 or 2 of Rule 13.5.10 is a prohibited activity.”

Submission: Ravensdown has two of concerns regarding these rules. Firstly, as discussed in the General Submissions section above, Ravensdown is concerned that the nitrogen baseline is being used as the ‘backstop’ rather than the adoption of GMP as proposed in the policies.

Secondly, Ravensdown opposes in principle Variation 2 assigning prohibited activity status to the use of land for a farming activity where the nitrogen loss calculation exceeded the nitrogen baseline or is a farm enterprise in the Upper Hinds/Hekeao Plains Area. Such an approach is considered to be overly restrictive, unnecessary and inappropriate. Prohibited status removes all flexibility for Council to support appropriate farm practices and non-complying activity status provides the opportunity to address farming activities on a case by case basis to see whether any adverse environmental effects are more than minor and whether objectives and policies of the Plan can be met.

Ravensdown also seeks a consequential change to the rule to account for its request to delete Rule 13.5.10.

Relief Sought: Ravensdown seeks Council to:

- Amend Rule 13.5.12 to read (or similar words)

“13.5.12 The use of land for a farming activity that does not comply with condition 1 of Rule 13.5.9 ~~or condition 1 or 2 of Rule 13.5.10~~ is a prohibited non-complying activity.”

Plan Provision: Rule 13.5.14 (Page 7)

“13.5.14 Despite any of Rules 13.5.15 to 13.5.20 the use of land for a farming activity or farming enterprise in the Lower Hinds/Hekeao Plains Area is a discretionary activity, provided the following conditions are met:

- 1. The future nitrogen loss calculation for the area of land subject to any application for resource consent made under this rule will be less than or equal to 27 kg per hectare per annum for the activity applied for; and*
- 2. The total area of the land subject to any resource consent granted under this Rule and any area of land subject to Row B of Table 13(i) does not exceed 30,000 hectares; and*
- 3. The farming activity or farming enterprise is solely in the Lower Hinds/Hekeao Plains Area; and*
- 4. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A; and*
- 5. The Farm Environment Plan identifies the area of land subject to any application for a resource consent made under this Rule.”*

Submission: Ravensdown considers Rule 13.5.14 is redundant as the matters it intends to address are essentially covered in Rules 13.5.15 – 13.5.20. Ravensdown considers including Rule 13.4.15 confuses and complicates the simple rule structure contained in Rules 13.5.15 – 13.5.20.

Ravensdown opposes Rule 13.5.14 and seeks it to be deleted, with all reference to the rule subsequently deleted from the rules that follow.

Relief Sought: Ravensdown seeks Council to:

- Delete Rule 13.5.14 in its entirety and renumber the rules that follow accordingly;
- Amend Rules 13.5.15 – 13.5.18 and Rule 13.5.22 that follow by deleting any reference to Rule 13.5.14.

Plan Provision: Rules 13.5.15; 13.5.16 (Pages 7/8)

“13.5.15 Until 1 January 2017, the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a permitted activity, provided the following conditions are met:

- 1. The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; and either*
- 2. The practices in Schedule 24a are being implemented and the information required is recorded in accordance with Schedule 24a, and supplied to Canterbury Regional Council on request; or*
- 3. A Farm Environment Plan has been prepared and is being implemented in accordance with Schedule 7 Part A, and supplied to Canterbury Regional Council on request.*

13.5.16 From 1 January 2017, the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a permitted activity, provided the following conditions are met:

1. *The nitrogen loss calculation for the property does not exceed 20 kg per hectare per annum; and*
2. *The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; and either*
3. *The practices in Schedule 24a are being implemented and the information required is recorded in accordance with Schedule 24a, and supplied to Canterbury Regional Council on request; or*
4. *A Farm Environment Plan has been prepared and is being implemented in accordance with Schedule 7 Part A, and supplied to Canterbury Regional Council on request.”*

Submission: Ravensdown supports the permitted activity status for the use of land in the Lower Hinds/Hekeao Plains Area provided for in Rules 13.5.15 and 13.5.16.

Relief Sought: Ravensdown seeks for Council to retain the permitted activity status for the use of land in the Lower Hinds/Hekeao Plains Area provided for in Rules 13.5.15 and 13.5.16.

Plan Provision: Rule 13.5.17 Matter of Discretion 4. (Page 8)

“13.5.17 From 1 January 2017, the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a restricted discretionary activity, provided the following conditions are met:

1. *The nitrogen loss calculation for the property is greater than 20 kg per hectare per annum; and*
2. *The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; and*
3. *A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A.*

The exercise of discretion is restricted to the following matters:

4. *Any nitrogen loss rates to be applied in accordance with Table 13 (h); and*

Submission: Rule 13.5.17 provides for the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area to be a restricted activity from January 2017 subject to a number of conditions. Council has restricted its discretion to a number of matters, and matter 4. requires any nitrogen loss rates for dairy farms and dairy support to be in accordance with the % reductions beyond GMP as specified in Table 13(h).

Ravensdown is concerned that it is not possible to determine the correct % reduction nitrogen loss rate beyond GMP nitrogen loss rates when these findings of the MGM Project that will determine the GMP nitrogen loss rates have not yet been released.

Ravensdown considers there are equitability issues when proposed Variation 2 is targeting one specific agriculture sector (Dairy) rather than applying sound nutrient management rules to meet the plan objective regardless of the sector under which the activity falls.

Relief Sought: Ravensdown seeks Council to:

- Either delete reference to Table 13 (h) or withdraw Variation 2 until such time as GMP nitrogen loss rates can be established.
- As an alternative, retain Table 13 (h), but delete specific percentage reduction values until GMP nitrogen loss rates are determined for all farming activities, and appropriate percentage reductions can be determined for each sector.

Plan Provision: Rule 13.5.19 (Page 8)

“13.5.19 The use of land for a farming activity that does not comply with any of conditions 2 or 3 in Rule 13.5.15, conditions 3 or 4 of Rule 13.5.16, condition 3 of Rule 13.5.17, or a farming enterprise that does not comply with condition 3 of Rule 13.5.18, is a non-complying activity.”

Submission: Ravensdown notes that Rule 13.5.19 relates to a farming activity either implementing Schedule 24a or preparing a FEP, and a farm enterprise needs to prepare a FEP. Ravensdown does not consider non-compliance with the stated conditions in Rules 13.5.15 - 13.5.18 would have adverse environmental effects or be contrary to the objectives and policies of the proposed Variation that would warrant non-complying activity status.

Ravensdown considers discretionary activity status would appropriately provide for those activities that do not comply with the stated conditions.

Relief Sought: Ravensdown seeks Council to amend Rule 13.5.19 as follows (or similar wording):

“13.5.19 The use of land for a farming activity that does not comply with any of conditions 2 or 3 in Rule 13.5.15, conditions 3 or 4 of Rule 13.5.16, condition 3 of Rule 13.5.17, or a farming enterprise that does not comply with condition 3 of Rule 13.5.18, is a discretionary ~~non-complying~~ activity.”

Plan Provision: Rule 13.5.20 (Page 9)

“13.5.20 The use of land for a farming activity that does not comply with condition 1 of Rule 13.5.15, condition 2 of Rule 13.5.16, condition 2 of Rule 13.5.17 or conditions 1 or 2 of Rule 13.5.18 or a farming enterprise that does not comply with any of the conditions of Rule 13.5.14, is a prohibited activity.”

Submission: Similar to the comments above on Rule 13.5.12, Ravensdown opposes in principle Variation 2 assigning prohibited activity status to the use of land for a farming activity where the nitrogen loss calculation exceeded the nitrogen baseline or is a farm enterprise in the Lower Hinds/Hekeao Plains Area. Such an approach is considered to be

overly restrictive, unnecessary and inappropriate. Prohibited status removes all flexibility for Council to support appropriate farm practices and non-complying activity status provides the opportunity to address farming activities on a case by case basis to see whether any adverse environmental effects are more than minor and whether objectives and policies of the Plan can be met.

Relief Sought: Ravensdown seeks Council to amend Rule 13.5.20 as follows (or similar wording):

“13.5.20 The use of land for a farming activity that does not comply with condition 1 of Rule 13.5.15, condition 2 of Rule 13.5.16, condition 2 of Rule 13.5.17 or conditions 1 or 2 of Rule 13.5.18 or a farming enterprise that does not comply with any of the conditions of Rule 13.5.14, is a non-complying ~~prohibited~~ activity.”

Plan Provision: Rule 13.5.21 (Page 9)

“13.5.21 Despite Rules 13.5.13 to 13.5.20, the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a permitted activity, provided the following condition is met:

1. The property is irrigated with water from an irrigation scheme or a principal water supplier, and the irrigation scheme or principal water supplier holds a discharge consent granted under Rule 5.61, Rule 5.62 or Rule 13.5.22.”

Submission: Ravensdown supports the intent of Rule 13.5.21 and the permitted activity status assigned and seeks for the rule to be retained as written.

Relief Sought: Ravensdown seeks for Council to retain the intent of Rule 13.5.21 and the permitted activity status assigned as it is currently written.

Plan Provision: Rule 13.5.22 2. (Page 9)

“13.5.22 The discharge of nutrients onto or into land in circumstances that may result in a contaminant entering water in the Lower Hinds/Hekeao Plains Area that would otherwise contravene s15(1) of the RMA is a discretionary activity, provided the following conditions are met:

2. The nitrogen loss calculation for the total area of the land will not exceed the nitrogen load calculated in accordance with Rows A and/or B in Table 13(i); and”

Submission: Ravensdown considers it is not possible to determine the correct % reduction loss rate beyond GMP nitrogen loss rates when these GMP loss rates have not yet been determined.

Relief Sought: Ravensdown seeks Council to:

- Delete reference in Rule 13.5.22 2. to % reductions beyond GMP nitrogen loss (Row A, in Table 13 (i)) until such time as GMP nitrogen loss rates can be established.

Plan Provision: Rule 13.5.23 (Page 9)

“13.5.23 The discharge of nutrients onto or into land in circumstances that may result in a contaminant entering water that would otherwise contravene s15(1) of the RMA that does not meet one or more of the conditions in Rule 13.5.22 is a prohibited activity.”

Submission: As stated above, Ravensdown opposes in principle Variation 2 assigning prohibited activity status. Such an approach is considered to be overly restrictive, unnecessary and inappropriate. Prohibited status removes all flexibility for Council to support appropriate farm practices and non-complying activity status provides the opportunity to address farming activities on a case by case basis to see whether any adverse environmental effects are more than minor and whether objectives and policies of the Plan can be met.

Relief Sought: Ravensdown seeks Council to amend Rule 13.5.23 as follows (or similar wording):

“13.5.23 The discharge of nutrients onto or into land in circumstances that may result in a contaminant entering water that would otherwise contravene s15(1) of the RMA that does not meet one or more of the conditions in Rule 13.5.22 is a ~~prohibited~~ non-complying activity.”

Plan Provision: Rule 13.5.24 (Page 9)

“13.5.24 The discharge of nutrients onto or into land in circumstances that may result in a contaminant entering water that would otherwise contravene s15(1) of the RMA is a permitted activity, provided the following condition is met:

1. The land use activity associated with the discharge is authorised under Rules 13.5.8 to 13.5.20.”

Submission: Ravensdown supports permitted activity status for land use activity associated with discharges provided for in Rules 13.5.8 – 13.5.20.

Relief Sought: Ravensdown seeks for Council to retain the intent of Rule 13.5.24 as it is currently written.

Plan Provision: Table 13 (h) (Page 19)

Table 13(h): Required Nitrogen Loss Rates Beyond Good Management Practice

Land use	2020	2025	2030	2035
Dairy Farm	15% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>	25% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>	35% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>	45% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>
Dairy Support	10% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>	15% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>	20% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>	25% <u>Reduction from good management practice nitrogen loss rates calculated based on the baseline land uses</u>
Other farming activities	0%	0%	0%	0%

Submission: Ravensdown notes that Table 13 (h) requires a series of stepped reductions over time in Nitrogen loss expressed as a percentage beyond GMP.

While the concept is supported for a stepped reduction over a realistic timeframe to achieve the agreed and acceptable balance between meeting production potential and environmental protection, Table 13(h) locks in unknown consequences when the GMP nitrogen loss values are not yet determined or known.

Furthermore, Table 13 (h) singles out the Dairy Sector alone as requiring reductions beyond GMP nitrogen loss rates. A framework for managing nutrient loss in productive agriculture should be sufficiently robust to set control nutrient loss without targeting specific sectors, but rather allow market and available mitigation options to dictate the most appropriate and nutrient efficient land use activity.

Relief Sought: Ravensdown seeks for Council to:

- Delete Table 13 (h) until such time as GMP nitrogen loss can be established;
- As an alternative, retain Table 13 (h) but delete specific percentage reduction values until GMP nitrogen loss values are determined for all farming activities, and appropriate percentage reductions can be determined for each sector.

Plan Provision: Table 13 (i) (Page 20)

Row	Land Area (hectares)	Prior to 31 December 2016	From 1 January 2017	From 1 January 2020	From 1 January 2025	From 1 January 2030	From 1 January 2035
A	Land supplied with water from a Principal Water Supplier or that is within an irrigation scheme command area which was irrigated with water prior to 1 October 2014	The tonnage of nitrogen per year shall be calculated by multiplying: A x B; where A = The number of hectares irrigated. B = The Nitrogen Baseline.	The tonnage of nitrogen per year shall be calculated by multiplying: A x B; where A = The number of hectares irrigated. B = The Good Management Practice Nitrogen Loss Rates for the baseline land use.	The tonnage of nitrogen per year shall be calculated by multiplying: A x B x C; where A = The number of hectares irrigated. B = The Good Management Practice Nitrogen Loss Rates for the baseline land use. C = The 2020 percentage reductions in Table 13(h).	The tonnage of nitrogen per year shall be calculated by multiplying: A x B x C; where A = The number of hectares irrigated. B = The Good Management Practice Nitrogen Loss Rates for the baseline land use. C = The 2025 percentage reductions in Table 13(h).	The tonnage of nitrogen per year shall be calculated by multiplying: A x B x C; where A = The number of hectares irrigated. B = The Good Management Practice Nitrogen Loss Rates for the baseline land use. C = The 2030 percentage reductions in Table 13(h)	The tonnage of nitrogen per year shall be calculated by multiplying: A x B x C; where A = The number of hectares irrigated. B = The Good Management Practice Nitrogen Loss Rates for the baseline land use. C = The 2035 percentage reductions in Table 13(h)
B	Land supplied with water from a Principal Water Supplier or that is within an irrigation scheme command area which was not irrigated with water prior to 1 October 2014	The tonnage of nitrogen per year shall be calculated by multiplying the land area (in hectares) to be irrigated by 27 kg/N/ha/yr. (Example: 100 ha x 27 kg/N/ha/yr = 2.7 tonnes of nitrogen per year).					

Submission: Ravensdown notes that Table 13 (i) provides for stepped reduction in nitrogen load for the catchment over time.

While Ravensdown supports the concept for a stepped reduction over a realistic timeframe to achieve the agreed and acceptable balance between meeting production potential and environmental protection, Table 13(i) includes by reference Table 13(h) which locks in unknown consequences with percentage reductions beyond GMP nitrogen loss values, which are yet to be determined (as discussed above).

Relief Sought: Ravensdown seeks for Council to:

- Amend Table 13 (i) to remove reference to Table 13 (h);
- As an alternative, retain Table 13 (h), but delete specific percentage reduction values until GMP nitrogen loss values are determined for all farming activities, and appropriate percentage reductions can be determined for each sector.

Plan Provision: Schedule 24a (a) (i) – Farm Practices (Page 23)

“(a) Nutrient Management:

- (i) A nutrient budget based on soil nutrient tests has been prepared, using OVERSEER in accordance with the OVERSEER Best Practice Data Input Standards [2013], or an equivalent model approved by the Chief Executive of Canterbury Regional Council and reviewed annually. ...”*

Submission: Ravensdown notes that Schedule 24 – (a) (i) requires that nutrient budgets be reviewed annually. Ravensdown does not believe it is necessary to produce nutrient budgets annually.

The key issue is that an OVERSEER[®] Nutrient Budgets represents a long term annual average nutrient loss and therefore should not be expected to represent farm management responses to ‘within year’ variations. OVERSEER[®] is a world-class model which estimates the nutrient cycling in farm systems. It has been developed using New Zealand specific science validated against independent research sites, and undergoes continuous improvement as new robust science is made available.

OVERSEER[®] model assumes that:

- The user supplies actual and reasonable inputs;
- The system is at an equilibrium, or that productivity (stock, milk yield, crop yields) is in equilibrium with the inputs (fertiliser, supplements, irrigation both for rate and timing);
- Any management practice implemented on the farm follows best practice.

OVERSEER[®] uses data the farmer knows or has readily available. While Ravensdown supports keeping detailed records, a nutrient budget should be valid for 3 years, unless there has been a significant farm system change.

The Competent use of OVERSEER[®] Nutrient budgets requires familiarity with the model and, just as importantly, a sound knowledge of farm system. For regulatory and planning applications Certified Nutrient Management Advisers are required. Capability to deliver certified nutrient management plans will be improved if nutrient budgets are valid for 3 years unless there is a significant farm system change.

Data input adhering to the OVERSEER[®] Data Input Standards is supported.

It is acknowledged that to ensure the farm system is well represented by the current Nutrient Budget and that there have been no significant changes in the farm system, it could be valid to

review data (or the farm system) annually, although it would not be necessary to produce a new Nutrient Budget by a Certified Nutrient Management Adviser.

For example, as the review of farm records, or a review based on agreed industry programmes (where these are provided for by individual sector groups) might be used to also confirm the current Nutrient Budget is representative of the farm system, and there have not been any significant farm system changes.

Relief Sought: Ravensdown seeks for Council to amend Schedule 24 (a) Nutrient Management as follows (or similar wording):

“(i) A nutrient budget based on soil ~~nutrient~~ tests has been prepared, using OVERSEER in accordance with the OVERSEER Best Practice Data Input Standards [2013~~4~~], or an equivalent model approved by the Chief Executive of Environment Canterbury ~~and is reviewed annually~~. A nutrient budget will remain valid for 3 years unless there is a significant farm system change. Records kept to support the nutrient budget shall be reviewed annually in accordance with an industry programme approved by Environment Canterbury (or in the absence of an industry programme, as directed by Environment Canterbury) to assess whether any significant farm system changes are evident.

A significant farm system change is a change in farming practices beyond routine fluctuations that arise as a result of rotation, or annual/seasonal variation in climatic and/or market conditions.”