

## Morag Hamilton

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**From:** Chris Hansen <chris@rmaexpert.co.nz>  
**Sent:** Friday, 30 January 2015 10:35 a.m.  
**Subject:** "V2 pLWRP Further Submission"  
**Attachments:** Final Hinds PCLWRP further submission 300115.docx

Please find attached a further submission by Ravensdown Fertiliser Co-operative Ltd to submissions on V2 pLWRP relating to the Hinds/Hekeao Catchment.

Please contact me if you have any questions.

Regards

Chris Hansen  
RMA Planning Consultant/Company Director  
*Chris Hansen Consultants Ltd*  
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**FURTHER SUBMISSION ON PROPOSED CANTERBURY LAND & WATER REGIONAL PLAN**

(Closing date: Friday 30 January 2015)

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

**Further Submission on:** Proposed Variation 2 to the Proposed 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

30 January 2015

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Date

Submitter ID/Name	Point ID	Plan Provision	Support/ Oppose	Reason
ID: 53274: Fish & Game Council South Island	V2 pLWRP – 392; 393; 394	Add new objectives	Oppose	The submitter seeks a number of new Objectives stating outcomes that either repeats the RMA; are policies not objectives; or are already adequately covered in the current Variation 2 objectives. Ravensdown opposes the provisions requested as they are contrary to its own submission, are vague and create uncertainties, and are unnecessary and inappropriate when considering the current provisions of Variation 2. Overall the objectives sought do not represent sound resource management planning practice.
	V2 pLWRP – 476; 482;	Add new policies	Oppose	The submitter seeks new policies relating to direct and indirect discharges to surface water and groundwater and land use activities affecting groundwater and surface water, including nutrient management requirements. Ravensdown opposes the provisions requested as they are contrary to its own submission, are vague and create uncertainties, and are unnecessary and inappropriate when considering the current provisions of Variation 2. Overall the policies sought do not represent sound resource management planning practice.
	V2 pLWRP - 403	Replace Policy 13.4.9 with new policy that prohibits any increase in nitrogen leaching	Oppose	The submitter seeks Policy 13.4.9 to be deleted and replaced with a new policy that includes prohibiting the increase in nitrogen leaching. Ravensdown opposes the new policy as it is contrary to its own submission, is unnecessary and inappropriate, and does not represent sound resource management planning practice
	V2 pLWRP – 474	Amend Policy 13.4.12	Oppose	The submitter seeks amendments to Policy 13.4.12 so that it applies to the entire Hinds/Hekeao Catchment, also addresses Phosphorus, and applies to meeting instream targets. Ravensdown opposes these amendments as they are contrary to its own submission, are unnecessary and inappropriate, and do not represent sound resource management planning practice.
	V2 pLWRP – 506; 507; 508; 509; 510; 511; 513; 514; 515; 516; 517; 518;	Delete Rules 13.5.8; 13.5.9; 13.5.10; 13.5.11; 13.5.12; 13.5.13; 13.5.14; 13.5.15; 13.5.16; 13.5.17; 13.5.18; 13.5.19; 13.5.20; 13.5.21;	Oppose	The submitter seeks new rules that seek to achieve nutrient management based on LUC leaching rates that it includes in a table. The submitter also seeks for any activity that increases nitrogen or phosphorus leaching to be a prohibited activity. Ravensdown opposes these amendments as they are contrary to its own submission, are unnecessary and inappropriate, and do

	519; 512; 520; 521; 523	13.5.22; 13.5.23; 13.5.24 and replace with a rules that achieves outcomes listed		not represent sound resource management planning practice.
	V2 pLWRP – 524	Rule 13.5.9	Oppose	The submitter seeks for the activity status of Rule 13.5.9 to be amended to controlled activity. Ravensdown opposes this amendment as it is contrary to its own submission, is unnecessary and inappropriate, and does not represent sound resource management planning practice.
	V2 pLWRP – 567; 568	Schedule 7 – Farm Environment Plan	Oppose	The submitter seeks and amendment to Schedule 7 and 24a to include 50 metre setbacks (as a minimum) to important waterbodies; and to limit nitrogen-loading and application depth and rate dependent on soil type and quality of the receiving environment. Ravensdown opposes this request as it is poorly defined (what are ‘important’ waterbodies), is unnecessary and inappropriate, and does not represent sound resource management planning practice.
ID 53688 Department of Conservation	V2 pLWRP – 423	Policy 13.4.13	Oppose	The submitter seeks Policy 13.4.13(c) amended by deleting ‘enabling’ and replacing with ‘controlling’. Ravensdown opposes this submission as the request is considered to be unnecessary and inappropriate and does not represent sound resource management planning practice.
ID 56730 Hinds Plains Land and Water Partnership	V2 pLWRP – 290	Definitions – GMP yet to be defined – introduce through plan change in accordance with Policy 4.11 (pLWRP)	Support	The submitter seeks the Policy 4.11 of the pLWRP to introduce Good Management Practice when available. Ravensdown supports this submission which is consistent with its own submission and represents sound resource management planning practice.
ID 52233 Nga Runanga and Te Runanga O Ngai Tahu	V2 pLWRP – 1321	Definitions – delete definition of Baseline Land Use and replace with definition Change of Land Use	Support in part/Oppose in part	The submitter seeks the definition of Baseline Land Use be deleted. Ravensdown supports this relief which is consistent with Ravensdown’s own submission. The submitter also seeks the definition of Baseline Land Use be replaced with the definition of Change in Land Use. Ravensdown opposes the proposed new definition as it is all inclusive (refers to “any increase in area...”; “any increase in the number...”), is not effects based and does not represent sound resource management planning practice.
ID 56725 Fertiliser Association of New Zealand		Entire submission	Support	Ravensdown supports in principle the entire submission by Ballance Agri-nutrients Ltd which is consistent with Ravensdown’s own submission and represents sound resource management planning practice.