

Morag Hamilton

From: Lynn Torgerson <Lynn.Torgerson@pdp.co.nz>
Sent: Friday, 30 January 2015 11:23 a.m.
To: Mailroom Mailbox
Cc: Michael Salvesen
Subject: Upper Hinds Plains Land User Group - Further submission to proposed Variation 2 of the pLWRP
Attachments: C03182500_L002_ Further submission to Variation 2_ final_lodged.pdf
Importance: High

Good morning mailroom

On behalf of the **Upper Hinds Plains Land User Group (UHPLUG)**, please find attached their further submission on proposed Variation 2 to the proposed Canterbury Land and Water Regional Plan.

The contact person for this group is Mr Michael Salvesen (salvesen@farmside.co.nz). His contact details are included in this further submissions.

Thanks

Lynn Torgerson

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FURTHER SUBMISSIONS IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSIONS ON THE PROPOSED VARIATION 2 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

To: Environment Canterbury

Name of the further submitter: Upper Hinds Plains Land User Group (UHPLUG)

This is a further submission relating to:

- Submissions on proposed Variation 2 to the proposed Canterbury Land and Water Regional Plan (Variation 2)

Its further submission is set out in the attached document.

UHPLUG provided an original submission in relation to Variation 2 and also has an interest greater than the interest of the general public.

UHPLUG wishes to be heard in support of its further submissions,

If others make a similar submission, UHPLUG will consider presenting a joint case with them at a hearing.

Thank you



Michael Salvesen
Upper Hinds Plains Land User Group

Dated: 30 January 2015

Address for service:

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Further Submissions of Upper Hinds Plains Land User Group (Original submitter ID 56707)

Where the Upper Hinds Plains Land User Group (UHPLUG) submitted on the same variation point as any other submitter it stands by its original submission. This Further Submission provides UHPLUG’s view on points raised by other submitters.

Policy 13.4.9 (c)					
Submitter Name	Submission Number	Variation 2 Reference	Reasons	Support/Oppose	Relief sought
Dairy NZ	V2pLWRP-549	Policy 13.4.9 (c)	<p>We support a policy that recognises that the water quality risks in the Upper Hinds area are primarily from sediment, P and <i>E.coli</i> inputs rather than nitrogen leaching, and therefore managing these risks via controls on nitrogen losses is unnecessary and is not likely to effectively manage the risks.</p> <p>We support the management of nitrogen loss (and other contaminants) through the use of Farm Environment Plans, adoption of GMPs and in-stream contaminant (including DIN) concentration limits.</p>	Support	Accept the submission
Fonterra Co-operative Group Limited	V2pLWRP-751	Policy 13.4.9 (c)	<p>We support a policy that recognises that the water quality risks in the Upper Hinds area are primarily from sediment, P and <i>E.coli</i> inputs rather than nitrogen leaching, and therefore managing these risks via controls on nitrogen losses is unnecessary and is not likely to effectively manage the risks.</p> <p>We support the management of nitrogen loss (and other contaminants) through the use of Farm Environment Plans, adoption of GMPs and in-stream contaminant (including DIN) concentration limits.</p>	Support	Accept the submission

Policy 13.4.11					
Submitter Name	Submission Number	Variation 2 Reference	Reasons	Support/Oppose	Relief sought
Dairy NZ	V2pLWRP-557	Policy 13.4.11	We support a policy that recognises that risks to water quality and ecological health in the Upper Hinds are affected by sediment, P and <i>E.coli</i> and N, but that N is not the over-riding priority in management. Accordingly, policies should direct focus on managing all key risks rather than single focus on an N load limit.	Support	Accept the submission
Fonterra Co-operative Group Limited	V2pLWRP-766	Policy 13.4.11	We support a policy that recognises that risks to water quality and ecological health in the Upper Hinds are affected by sediment, P and <i>E.coli</i> and N, but that N is not the over-riding priority in management. Accordingly, policies should direct focus on managing all key risks rather than single focus on an N load limit.	Support	Accept the submission
Sub-regional Rule 13.5.8					
Submitter Name	Submission Number	Variation 2 Reference	Reasons	Support/Oppose	Relief sought
Dairy NZ	V2pLWRP-570	Rule 13.5.8	Water quality risks in the Upper Hinds are primarily related to the sediment, phosphorus and <i>E coli</i> inputs rather than nitrogen. The risks associated with nitrogen concentrations instream does need to be managed (alongside other contaminants that adversely affect values) but the main risks to water quality are from run-off and riparian management rather than nitrogen leaching.	Support	Accept the submission

Fonterra Co-operative Group Limited	V2pLWRP-783	Rule 13.5.8	Water quality risks in the Upper Hinds are primarily related to the sediment, phosphorus and <i>E coli</i> inputs rather than nitrogen. The risks associated with nitrogen concentrations instream does need to be managed (alongside other contaminants that adversely affect values) but the main risks to water quality are from run-off and riparian management rather than nitrogen leaching.	Support	Accept the submission
Irrigation New Zealand	V2pLWRP-186	Rule 13.5.8	Water quality risks in the Upper Hinds are primarily related to the sediment, phosphorus and <i>E coli</i> inputs rather than nitrogen. The risks associated with nitrogen concentrations instream does need to be managed (alongside other contaminants that adversely affect values) but the main risks to water quality are from run-off and riparian management rather than nitrogen leaching.	Support	Accept the submission
Synlait Milk Ltd	V2pLWRP-238	Rule 13.5.8	Water quality risks in the Upper Hinds are primarily related to the sediment, phosphorus and <i>E coli</i> inputs rather than nitrogen. The risks associated with nitrogen concentrations instream does need to be managed (alongside other contaminants that adversely affect values) but the main risks to water quality are from run-off and riparian management rather than nitrogen leaching.	Support	Accept the submission
Sub-regional Rule 13.5.9					
Submitter Name	Submission Number	Variation 2 Reference	Reasons	Support/Oppose	Relief sought
Irrigation New Zealand	V2pLWRP-187	Rule 13.5.9	Nitrogen is not the main risk to water quality in the Upper Hinds/Hekeao Plains Area.	Support	Accept the submission

Dairy NZ	V2pLWRP-571	Rule 13.5.9	Nitrogen is not the main risk to water quality in the Upper Hinds/Hekeao Plains Area.	Support	Accept the submission
Fonterra Co-operative Group Limited	V2pLWRP-784	Rule 13.5.9	Nitrogen is not the main risk to water quality in the Upper Hinds/Hekeao Plains Area.	Support	Accept the submission
Section 13.7.3 Water Quality Limits and Targets Table 13(g)					
Submitter Name	Submission Number	Variation 2 Reference	Reasons	Support/Oppose	Relief sought
Dairy NZ	V2pLWRP-596	Table 13 (g)	<p>Water quality risks in the Upper Hinds are primarily related to the sediment, phosphorus and <i>E coli</i> inputs rather than nitrogen. The risks associated with nitrogen concentrations instream through N loss can be managed (alongside other contaminants that adversely affect values) through implementation of Schedule 24a and Farm Environment Plans.</p> <p>Specification of concentration objectives/limits is more appropriate in the Upper Hinds/Hekeao Plains Area than a nitrogen load limit.</p>	Support	Accept the submission
Fonterra Co-operative Group Limited	V2pLWRP-807	Table 13 (g)	<p>Water quality risks in the Upper Hinds are primarily related to the sediment, phosphorus and <i>E coli</i> inputs rather than nitrogen. The risks associated with nitrogen concentrations instream through N loss can be managed (alongside other contaminants that adversely affect values) through implementation of Schedule 24a and Farm Environment Plans.</p> <p>Specification of concentration objectives/limits is more appropriate in the Upper Hinds/Hekeao Plains Area than a nitrogen load limit.</p>	Support	Accept the submission

Section 13.7.3 Water Quality Limits and Targets Table 13(j)					
Submitter Name	Submission Number	Variation 2 Reference	Reasons	Support/Oppose	Relief sought
Dairy NZ	V2pLWRP-1241	Table 13(j)	<p>In light of our original submissions, and our further submissions as listed above, UHPLUG supports the re-drawing of a table of nutrients, and other contaminants, as targets to be met/maintained where it applies to the Upper Hinds catchment.</p> <p>We support a new table to be drawn up with consideration of farm management plans and the use of Matrix of Good Management to set suitable targets to be implemented.</p>	Support in part	Accept the submission