
From: Eve Williams <Eve.Williams@hortnz.co.nz>
Sent: Friday, 30 January 2015 4:49 p.m.
Subject: Further Submission on Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan
Attachments: Further Submission Binder1.pdf

EC128942

Good afternoon,

On behalf of Horticulture New Zealand, please find attached our further submission on the Proposed Variation 2 of the Proposed Canterbury Land and Water Regional Plan.

Please email confirmation of the receipt of this submission.

Kind regards,

Eve Williams | Executive Assistant to Chris Keenan & Angela Halliday

Horticulture New Zealand

P +64 4 472 3795 | **D** +64 4 470 5668 | **M** +64 27 333 4447 | **W** www.hortnz.co.nz

PO Box 10232, The Terrace, Wellington 6143



Further Submission on Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan – Section 13 Ashburton

(Closing date: Friday 30 January 2015)

To: Environment Canterbury
PO Box 345
Christchurch 8140
Email: mailroom@ecan.govt.nz

Full Name of Further Submitter:
Horticulture New Zealand

Full Postal Address:
P O Box 10 232
Wellington 6143

Attn: Angela Halliday

Telephone Number: 04 470 5664
Email: Angela.Halliday@hortnz.co.nz

Fax Number: 04 471 2861

Horticulture New Zealand represents horticultural growers in the Canterbury Region, so represents a relevant aspect of the public interest.

This letter supports the further submissions from Horticulture New Zealand to proposed Variation 2 – Canterbury Land and Water Plan.

Horticulture New Zealand has made a number of further submissions, which are attached to this covering letter.

Horticulture New Zealand is not a trade competitor and would not gain any advantage through this further submission.

Please do not hesitate to contact me should you wish to discuss these further submissions.

Yours Faithfully

A handwritten signature in purple ink that reads "A Halliday".

Angela Halliday
Advisor, Natural Resources & Environment
Horticulture New Zealand

Date: 30 January 2015

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Nga Runanga and Te Runanga O Ngai Tahu	52233 V2 pLWRP-181	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Add a new catchment objective: The freshwater resources of the Hinds/ Hekeao catchment support a prosperous land-based economy; and water quality and flows in the Upper Hinds/Hekeao Plains Area are maintained and in the lower Hinds/Hekeao Plains Area they are improved.	Support in part	The Variation should have a specific objective for the catchment rather than relying on the more generic objectives in the pLWRP. An objective that recognises the importance of the land based economy is supported.	Add a catchment objective that recognises the importance of the land based economy.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-289	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Amend the Variation to allow for an equivalent model to OVERSEER if available which may suit arable farmers.	Support	There needs to be the ability to use models other than OVERSEER which are more appropriate for some crops.	Amend Variation 2 to ensure that models other than OVERSEER are able to be used.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-319	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Amend Variation to require figures (usually 20kg/27kg) to be adjusted to maintain equivalence following changes to OVERSEER version protocols.	Support in part	The use of OVERSEER in a regulatory framework requires appropriate version control to ensure that all figures, including the whole catchment load, are adjusted if the OVERSEER version changes.	Amend Variation to require all figures including the whole catchment load to be recalculated and adjusted to maintain equivalence following changes to OVERSEER version protocols.
Fish and Game Council Central South Island	53274 V2 pLWRP- 392	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Add a new objective: To sustainably manage the use and development of land, the discharge of contaminants including nutrients, and the taking, using, damming or diverting of freshwater in the Hinds/Hekeao Plains Catchment so that: a) Groundwater levels, river flows, lake and wetland levels and water quality maintain or enhance the habitat and health of aquatic	Oppose in part	Horticulture NZ supports the inclusion of a catchment specific objective but consider that the matters sought by the submitter are more specific policy matters and that the objective should be at a broad level as sought in the submission by Ngai Tahu 52233 V2 pLWRP-181. There is no recognition of the existing land use in the objective sought by the submitter.	Decline submission but include a catchment objective as sought by Ngai Tahu 52233 V2 pLWRP-181.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>ecosystems, macroinvertebrates, native fish and salmonoids;</p> <p>b) Water quality enable safe contact recreation and food gathering;</p> <p>c) Water quality and quality enable sage and reliable human drinking water supplies;</p> <p>d) The frequency and duration of excessive periphyton growth that adversely affect ecosystem health, recreational and cultural uses and amenity are reduced;</p> <p>e) Wetlands are protected as significant habitats;</p> <p>f) The mauri of surface water bodies and groundwater is recognised and adverse effects on aspects of water quality and water quantity that contribute to healthy mauri are avoided.</p>			
Fish and Game Council Central South Island	53274 V2 pLWRP- 393	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	<p>Add a new objective:</p> <p>Where the quality and quantity of fresh water has been degraded by human activities to such an extent that the freshwater Objectives set out above and in table 13 a are not being achieved, water quality and quantity shall not be allowed to degrade further and it shall be improved progressively over time so that the objectives set out above and in table 13 a) is achieved by 2050.</p>	Oppose in part	<p>Horticulture NZ supports the inclusion of a catchment specific objective but consider that the matters sought by the submitter are more specific policy matters and that the objective should be at a broad level as sought in the submission by Ngai Tahu 52233 V2 pLWRP-181.</p>	<p>Reject submission but include a catchment objective as sought by Ngai Tahu 52233 V2 pLWRP-181.</p>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Fish and Game Council Central South Island	53274 V2 pLWRP- 394	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Add a new objective: Preservation of the natural character of rivers, wetlands, their margins and their natural processes and protection from inappropriate use and development.	Oppose	The objective sought is already provided for in the RMA and does not need to be repeated in the Variation.	Reject submission to add new objective.
Director General of Conservation	53688 V2 pLWRP-459	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Add a new method 13.5.38 as follows: The following management methods will also be applied where appropriate in the catchment to achieve the outcomes desired in the ZIP Solutions package in the Hinds. Hekeao Plains: <ol style="list-style-type: none"> 1. Riparian management and fencing 2. Improved drain management 3. Point source discharge management 4. Well head protection 5. Legacy sediment removal 6. In-stream habitat restoration 7. River mouth opening 8. Fish passage management 9. Existing wetland management 10. Constructed wetland establishment and management. 	Support	Variation 2 focuses on the regulatory methods for the catchment and does not include a method for non-regulatory methods that are appropriate for the catchment and contribute to achieving the objectives for the catchment. The methods are described in the ZIP Solutions package and are appropriate to include in the Plan.	Accept submission to add new method as sought by the submitter.
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-535	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Add a new rule to the effect that if OVERSEER is updated the most recent version can be used to: <ol style="list-style-type: none"> a) recalculate any N-loss limit/ load including nitrogen baseline b) assess compliance against recalculated load. A condition of the rule is that the same input date would be used.	Support in part	The use of OVERSEER in a regulatory framework requires appropriate version control to ensure that all figures, including the whole catchment load, are adjusted if the OVERSEER version changes.	Amend Variation to require all figures including the whole catchment load to be recalculated and adjusted to maintain equivalence following changes to OVERSEER version protocols.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Dairy NZ	52271 V2 pLWRP-591	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Amend and review all tables to align the relevant attributes as freshwater objective's as per the NPS-FM	Support	The Variation should be consistent with the NPSFM in order to give effect to it.	Accept the submission and amend and review all tables to align the relevant attributes as freshwater objective's as per the NPS-FM
Ravensdown Fertiliser Co-operative Ltd	56708 V2 pLWRP-718	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	If Var 2 is not withdrawn include a note or reference in a policy outlining that Council will introduce into the pLWRP by variation or plan change the MGM numbers when available.	Support in part	Horticulture NZ has sought that Variation 2 is an interim plan until further modelling has been done and MGM numbers known. The submitter seeks a similar approach.	Accept submission to ensure that there is a variation or plan change when the MGM numbers are known.
Fonterra Co-operative Group Ltd	52333 V2 pLWRP-804	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Review all tables to align relevant attributes as freshwater objectives as per the NPS-FM. This should include moving Tables 13 (j) and 13 k) so that the relevant attributes are included in Table 13 a) as freshwater objectives.	Support	The Variation should be consistent with the NPSFM in order to give effect to it.	Accept the submission and amend and review all tables to align the relevant attributes as freshwater objective's as per the NPS-FM
Ortongreen Farm Ltd	56711 V2 pLWRP-945	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Amend Table 13 h) by including percentage reductions to nitrogen losses beyond GMP for all farming enterprises exceeding 27kg/N/ha/yr without reference to farming type (dairy, dairy support or other).	Support in part Oppose in part	It is recognised that all operations that are high leachers should reduce leaching rates but it should not be based on a blanket percentage reduction, but that all nitrogen discharge allowances reduce overtime to reach an agreed figure across the catchment.	Accept the submission in part but ensure that the reduction regime means that all operations are entitled to the same nutrient discharge allowance amount across the catchment, not a blanket percentage reduction.
Dairy Holdings Ltd	53683 V2 pLWRP-1015 – (2 nd PART)	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	DHL seeks continuing recognition of farming enterprises and express reference to farming enterprises being able to establish across multiple water source properties and/or properties that take water from different sources for the purposes of being able to manage nutrients in an integrated manner.	Support in part	Horticulture NZ supports the recognition of farming enterprises and seeks that the Variation specifically and adequately provide for such enterprises.	Accept the submission to recognise and provide for farming enterprises.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Bank of NZ Christchurch	53830 V2 pLWRP-1143	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Amend references to nitrogen discharge levels by replacing 'targets' with 'limits'	Oppose	Targets are an appropriate mechanism as provided for in the NPSFM. Horticulture NZ seeks that limits are 'targets' until further modelling has been undertaken.	Reject the submission to amend references to nitrogen discharge levels by replacing 'targets' with 'limits'.
Bank of NZ Christchurch	53830 V2 pLWRP-1144	Proposed Var 2 to the pCLWRP – Sec 13 Ashburton	Consider a more consistent and equitable discharge allocation regime across the whole Hinds/ Hekeao Plains Area.	Support	Horticulture NZ and Beef and Lamb NZ have sought an alternative allocation mechanism that would be more consistent and equitable across the whole Hinds/ Hekeao Plains Area.	Accept the submission to the extent that the Horticulture NZ and Beef and Lamb NZ submissions seek an alternative allocation regime.
Rangitata Diversion Race Management	56706 V2 pLWRP-613	Section 13.1 Preamble	Refer to submission for full text: Replace the references to 45% and 2035 with the figures derived from a comprehensive and detailed investigation that employs methodology set out in Annex A of this submission, while also adding text to ensure that it is clear that the % reduction or actual reduction, the timeframe for that reduction and the achievement of 3,400 t N/yr are targets not limits.	Support in part Oppose in part	The submitter seeks an alternative approach for the catchment based on detailed investigations. Horticulture NZ supports further detailed investigations to derive appropriate figures but does not support a blanket % reduction regime. Recognition of agriculture is also supported.	Accept submission to the extent that detailed investigations are undertaken before setting limits in Variation 2 to ensure that figures are robust and based on sound science.
Beef +Lamb NZ Ltd	56727 V2 pLWRP-228	13.1A Definitions	Delete the definition of baseline land use following the adoption of the natural capital (LUC) based N loss allocation model.	Support in part	Horticulture NZ has sought an alternative definition of baseline land use to better incorporate horticultural crops. Horticulture NZ also supports an alternative allocation model and the definition of baseline land use may need to be amended as a result in a change of the allocation framework.	Amend definition of baseline land use consistent with changes sought to the allocation framework.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-285	13.1A Definitions	Amend the definition of nitrogen baseline: 1. The nitrogen baseline should be the highest from the 2009-2013 period provided the average continues to be complied with: or 2. Nitrogen baseline should be established at GMP levels once GMP is defined 3. Scheme base load should be assessed on consented entitlement, or assessment of fully developed scheme load based on GMP 4. Include farming enterprises.	Support in part	There needs to be greater flexibility in how nitrogen baseline is determined, particularly for farming enterprises. It should also be based on GMPs to ensure that the adoption of best practices is part of the calculation.	Amend definition of nitrogen baseline consistent with changes sought to the allocation framework and ensure that farming enterprises and GMPs are adequately incorporated.
Fish and Game Council Central South Island	53274 V2 pLWRP-395	13.1A Definitions	Add a definition of natural character a-e)	Oppose	Natural character has been described in case law and so it is not necessary to include a definition in the Plan which is a non-inclusive list thereby creating uncertainty.	Reject the submission to include a definition for natural character as sought by the submitter.
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-620	13.1A Definitions	Add a definition for Good Management Practices: means the implementation of the measures and practices set out in Schedule 24b Good Management Practices Add a definition of target: Means when used in the context of the Hinds/Hekeao Plains Area, an aspirational goal that the Council will, working with the community of the Hinds/ Hekeao Plains, work to achieve, to the extent that it is practicable, appropriate and accords with the purpose of the RMA.	Oppose in part Support in part	Basing GMP's on a Schedule would assist to clarify what are GMPs but the schedule is not yet populated. Target is defined in the NPSFM and it would be confusing to have a different definition as the Variation is giving effect to the NPSFM.	Provide clarity as to what are GMPs. Reject the submission to include a definition for target as sought by the submitter.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Fish and Game Council Central South Island	53274 V2 pLWRP-485	13.1A Definitions	Define good management practices so that their effectiveness for achieving specified outcomes can be met.	Oppose in part	The MGM process is seeking to define GMPs but not all the necessary science is currently available to be able to define them in the manner sought by the submitter.	Reject the submission to include a definition for good management practices as sought by the submitter.
Fertiliser Assoc of NZ	56725 V2 pLWRP-816	13.1A Definitions	Amend the definition of Good Management Practice Nitrogen Loss rates to include modelled with OVERSEER or equivalent model.	Oppose in part	Horticulture NZ seeks that the definition of Good Management Practice Nitrogen Loss rates also includes farming enterprises and so calculation of the rates needs to be able to incorporate farming enterprises.	Ensure that the calculation of Good Management Practice Nitrogen Loss rates needs to be able to incorporate farming enterprises.
Dairy Holdings Ltd	53683 V2 pLWRP-982	13.1A Definitions	Amend the definition of baseline land use to expressly include farming enterprises and irrigation schemes. (Refer to submission)	Support in part	Horticulture NZ seeks that farming enterprises are included in baseline land uses but does not support the sole reliance on OVERSEER.	Accept submission to include farming enterprises in the definition of baseline land uses.
Nga Runanga and Te Runanga O Ngai Tahu	52233 V2 pLWRP-1321	13.1A Definition	Delete the definition of baseline land use and replace with: Change of land use means: Any increase in the area of land irrigated on a property; or Any increase in the area of land under cultivation; or Any increase in the number of weaned catted grazed on the property; or any increase in the amount of effluent, sewage, biosolids or other organic material spread or otherwise disposed o on site; But does not include any of these activities where they have been authorised by a resource consent issued prior to 27 Sept 2014 where that	Oppose in part	The definition sought seeks to manage 'change of land use' rather than the 'baseline land use.' However the definition needs to take into account the farming enterprise, not just the 'property'. There should be the ability for the activity to alter but not be classed as a 'change of land use'.	Reject submission to delete the definition of baseline land use and replace with a definition for change of land use unless it adequately provides for farming enterprises.

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			resource consent has not yet been given effect but has not lapsed.			
Synlait Farms Ltd	56811 V2 pLWRP-988	Policy 13.4.6	Amend Policy 13.4.6 as follows: ...will be left in the river until such time as the catchment is no longer over allocated and in the Hinds/Hekeao Plains Area will not be reallocated and will be left in the river allocation is at or under catchment limit.	Support in part	Policy 13.4.6 currently is in the pLWP. Variation 2 seeks to apply a restriction to the Hinds/ Hekeao Plains Area in terms of reallocating surrendered water. Horticulture NZ seeks that the policy enables reallocation of water where the allocation is at or under the catchment limit. This approach should apply across the whole catchment and Hinds/ Hekeao Plains Area.	Amend Policy 13.4.6 as follows: The water resulting from any surrendered surface water and stream depleting groundwater takes in the Hakatere/Ashburton River catchment <u>and in the Hinds/Hekeao Plains Area</u> will not be reallocated and will be left in the river until such time as the catchment is no longer over allocated and in the Hinds/Hekeao Plains Area will not be reallocated and will be left in the river.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP - 297	Policy 13.4.6	Seeks that the amendment proposed to 13.4.6 be deleted: and in the Hinds/Hekeao Plains Area will not be reallocated and will be left in the river	Support in part	Policy 13.4.6 currently is in the pLWP. Variation 2 seeks to apply a restriction to the Hinds/ Hekeao Plains Area in terms of reallocating surrendered water. Horticulture NZ seeks that the policy enables reallocation of water where the allocation is at or under the catchment limit. This approach should apply across the whole catchment and Hinds/ Hekeao Plains Area.	Amend Policy 13.4.6 as follows: The water resulting from any surrendered surface water and stream depleting groundwater takes in the Hakatere/Ashburton River catchment <u>and in the Hinds/Hekeao Plains Area</u> will not be reallocated and will be left in the river until such time as the catchment is no longer over allocated and in the Hinds/Hekeao Plains Area will not be reallocated and will be left in the river.
Ashburton District Council	56631 V2 pLWRP-225	Policy 13.4.6	Seeks that Policy 13.4.6 is retained.	Oppose	Policy 13.4.6 currently is in the pLWP. Variation 2 seeks to apply a restriction to the Hinds/ Hekeao Plains Area in terms of reallocating surrendered water.	Reject the submission to retain Policy 13.4.6 as notified.

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					Horticulture NZ seeks that the policy enables reallocation of water where the allocation is at or under the catchment limit. This approach should apply across the whole catchment and Hinds/ Hekeao Plains Area.	
Central South Island Fish and Game Council	53274 V2 pLWRP-402	Policy 13.4.6	Supports the policy and seeks that it be retained	Oppose	Policy 13.4.6 currently is in the pLWP. Variation 2 seeks to apply a restriction to the Hinds/ Hekeao Plains Area in terms of reallocating surrendered water. Horticulture NZ seeks that the policy enables reallocation of water where the allocation is at or under the catchment limit. This approach should apply across the whole catchment and Hinds/ Hekeao Plains Area.	Reject the submission to retain Policy 13.4.6 as notified.
Balance Agri-Nutrients Ltd	56702 V2 pLWRP -131	Insert Policies 13.4.9 – 13.4.19	Include amendments to the policy sections to include a method that establishes the process for establishing an independent technical advisory panel. Purposes include appropriate use of OVERSEER. (Refer submission)	Support in part Oppose in part	While an independent technical advisory panel has merit it should not just be limited to the use of OVERSEER but also consider other appropriate models. Appropriate use should include management of version control.	Accept the submission to the extent that an independent technical advisory panel be established to assist in implementation of Variation 2 including technical advice on further modelling and revision of the catchment limits.
Fish and Game Council Central South Island	53274 V2 pLWRP -476	Insert Policies 13.4.9 – 13.4.19	Include a new policy that addresses direct and indirect discharges to surface waterbodies or groundwater, effectively listing prohibited activities and management mechanisms for other activities. (Refer to submission.)	Oppose	The submitter seeks a new extensive policy framework that would significantly alter the intent of the Variation. While there are a range of mechanisms that can be used to minimise discharge of contaminants Horticulture NZ does not support the prescriptive approach in the	Reject the submission to include new policy as sought by the submitter.

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					submission but rather seeks that the most appropriate mechanism is used for specific situations.	
Fish and Game Council Central South Island	53274 V2 pLWRP -482	Insert Policies 13.4.9 – 13.4.19	Add a new policy that addresses sediment, faecal contamination, and nutrients and lists how activities will be managed. (Refer to submission.)	Oppose	The submitter seeks a new policy that prescribes activities that must be undertaken in respect of the listed contaminants. While there are a range of mechanisms that can be used to minimise discharge of contaminants Horticulture NZ does not support the prescriptive approach in the submission but rather seeks that the most appropriate mechanism is used for specific situations.	Reject the submission to include new policy as sought by the submitter.
Fish and Game Council Central South Island	53274 V2 pLWRP -489	Insert Policies 13.4.9 – 13.4.19	Add a new policy that addresses water quantity and how it will be managed. (Refer to submission.)	Oppose in part	The new policy sought is based on values as sought by the submitter and not a full range of values. Horticulture NZ seeks recognition of crop survival water which is not provided for in the new policy sought.	Reject the submission to include new policy as sought by the submitter.
Fish and Game Council Central South Island	53274 V2 pLWRP -493	Insert Policies 13.4.9 – 13.4.19	Add a new policy that addresses water quantity and how it will be managed, including water efficiency and installation of water metering and telemetry. (Refer to submission.)	Oppose in part Support in part	Horticulture NZ supports the focus on water efficiency but seeks that all matters of efficiency are included, not just technical efficiency. Transfer of permits is also supported. Water measurement should be as required by the National Regulations for Water measurement and not require telemetry unless provided for in the regulations.	Ensure that the policy framework adequately provides for consideration of efficiency of water use, but not limited to technical efficiency as sought by the submitter.
Fonterra Co-operative Group Ltd	52333 V2 pLWRP -780	Insert Policies 13.4.9 – 13.4.19	Add a new Policy 13.4.14A as follows: <u>Enable catchment scale mitigations that improve overall water quality in the Hinds/Hekeao Plains Area and improve</u>	Support in part Oppose in part	Horticulture NZ supports the use of a range of catchment scale mitigations as other methods to improve water quality such as sought by the Director	Include a policy to provide for the use of non-regulatory catchment mitigations to assist in achieving

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			<u>reliability of supply for surface water takes, including:</u> <u>(a) improving flows in the spring fed water bodies;</u> <u>(b) decreasing nitrate nitrogen concentrations in the Hinds River/Hekeao and spring fed waterbodies; or</u> <u>(c) enhancing in-stream habitat.</u>		General of Conservation 53688 V2 pLWRP-459. It is considered appropriate to list such mechanisms as a method rather than specifying some mitigations and specific policy intents in a policy as these matters are already addressed in the policy framework.	improvements in water quality in the Hinds/ Hekeao Plains Area.
Upper Hinds Plains Land User Group	56707 V2 pLWRP-962	Policy 13.4.9(c)	Delete Policy 13.4.9(c) Restricting increases in nitrogen losses in the Upper Hinds/ Hekeao Plains Area.	Support	Horticulture NZ considers that there is insufficient justification for a policy restricting nitrogen losses in the Upper Hinds/Hekeao Plains Area catchment where the water quality data indicates that nitrate toxicity in the surface waterways of the Upper Hinds/Hekeao Plains Area is not currently an issue, and is unlikely in the future. Such an approach is not effects based. Inclusion of nitrogen in Policy 13.4.9 b) is adequate to ensure that management of nitrogen is considered in the Upper Hinds/Hekeao Plains Area.	Accept the submission to delete Policy 13.4.9c)

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Fonterra Cooperative Group Limited	52333 V2 pLWRP-751 & V2 pLWRP-752	Policy 13.4.9 (c) & (b)	Delete Policy 13.4.9(c) and amend Policy 13.4.9(b) as follows: Improving management of microbes, <u>nitrogen</u> , phosphorus, and sediment in both areas.	Support	Horticulture NZ considers that there is insufficient justification for a policy restricting nitrogen losses in the Upper Hinds/Hekeao Plains Area catchment where the water quality data indicates that nitrate toxicity in the surface waterways of the Upper Hinds/Hekeao Plains Area is not currently an issue, and is unlikely in the future. Such an approach is not effects based. Inclusion of nitrogen in Policy 13.4.9 b) is adequate to ensure that management of nitrogen is considered in the Upper Hinds/Hekeao Plains Area.	Accept the submission to delete Policy 13.4.9 c) and amend Policy 13.4.9b) by adding 'nitrogen'.
Central South Island Fish and Game Council	53274 V2 pLWRP-403	Policy 13.4.9	Delete Policy 13.4.9 and replace with a new policy as follows: Manage land use within the Hinds/Hekeao Plains catchment are by regulating farming so that: 1. Good management practices are implemented to reduce sediment, phosphorus, nitrogen and microbial contamination of surface water bodies 2. Where water quality currently meets the limits set in tables 13 a) and g) that such limits are not exceeded; 3. Where water quality currently exceeds the targets set in tables 13a) and g) that water quality is improved overtime as set out in tables 13h) and 13 i); 4. Increases in nitrogen leaching are prohibited;	Oppose in part	Horticulture NZ supports the used of good management practices to reduce contamination. However the policy is based on tables 13 a, g, h, and i) which are subject to other submissions. Horticulture NZ seeks further investigations and modelling work before any % reduction by 2030 can be set in place. In addition there may be circumstances where increases in nitrogen leaching can occur through the use of trading and transfer mechanisms. The policy framework sought is too blunt to provide for such mechanisms.	Reject the submission to delete Policy 13.4.9 and replace with a new policy.

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			5. A 45% reduction in nitrogen leaching is achieved by 2030.			
DairyNZ	52271 V2 pLWRP-550	Policy 13.4.9(d)	Amend policy 13.4.9 d) as follows: Reducing overall nitrogen losses by 45 <u>30</u> percent in the lower Hinds/Hekeao Plains Area and adopting the use of managed aquifer recharge to augment groundwater and/or surface water.	Support in part	Horticulture NZ has sought that further investigations and modelling be undertaken to confirm the figures in Variation 2. Once such modelling is undertaken and other mitigation measures considered the overall percentage reduction required would be able to be confirmed.	Accept the submission to amend nitrogen losses subject to amendment as the result of further modelling and information.
DairyNZ	52271 V2 pLWRP- 552	Policy 13.4.9(e)	Add a further Policy 13.4.9 e) as follows: Adopting the use of catchment scale mitigations for ground or surface water of the Hinds/Hekeao Plains, including augmentation, by way of managed aquifer recharge and targeted stream augmentation.	Support	Horticulture NZ supports moving the last part of proposed 13.4.9 d) into a new standalone clause so that the provision for catchment scale mitigations is clearly provided for.	Add new Policy 13.4.9 e) as sought by the submitter.
Eiffelton Community Group Irrigation Scheme Inc	56799 V2 pLWRP- 1032	Policy 13.4.9d)	Amend Policy 13.4.9 d) as follows: reducing overall nitrogen losses <u>from farming activities</u> by 45 <u>26</u> % in the lower Hinds/ Hekeao Plains Area and adopting the use of managed aquifer recharge to augment groundwater and/or surface water.	Support in part	The submitter seeks to make it clear that reduction in nitrogen losses are from farming activities which clarifies the policy intent.	Amend Policy 13.4.9 d) by adding: <u>reducing overall nitrogen losses from farming activities.</u>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Nga Runanga and Te Runanga O Ngai Tahu	52233 V2 pLWRP-199	Policy 13.4.10	Delete Policy 13.4.10 and replace with the following: See submission for details – policy focused on nitrogen.	Oppose	Proposed Policy 13.4.10 seeks to reduce microbes, phosphorus and sediment in the Hinds/ Hekeao Plains Area by a number of mechanisms. The submitter seeks to replace the policy with one focused solely on nitrogen. While the approach to nitrogen may have merit it does not address the issues relating to microbes, phosphorus and sediment.	Reject submission to delete Policy 13.4.10 and replace with new policy focused on nitrogen as sought by the submitter.
Central South Island Fish and Game Council	53274 V2 pLWRP-472	Policy 13.4.10	Amend Policy 13.4.10 including: c) Preparing and implementing farm environment plans in <u>accordance with Schedule 7 and 24a which set out and define good management practices and</u> d) <u>specifying set reduction in contaminant losses which work towards ensuring that catchment limits and target set out in amended tables 13a) and 13 g) are achieved by 2050.</u>	Support in part, Oppose in part	Specifying how farm environment plans are to be prepared is supported but the addition of specifying set reductions is not supported.	Amend 13.4.10c) as sought by the submitter but reject submission to add 13.4.10d).
Nga Runanga and Te Runanga O Ngai Tahu	52233 V2 pLWRP-200	Policy 13.4.11	Delete Policy 13.4.11 and replace with: Reduce losses of sediment and phosphorus to waterways by requiring land uses in areas which are vulnerable to sediment or phosphorus loss, as shown on Planning Maps xxx to implements sediment and phosphorus management measures as part of a Farm Environment Plan.	Support in part	Removal of the nitrogen cap in the Upper Hinds/Hekeao Plains Area is supported as N is not currently an issue in that Area and can be managed through requiring adoption of good management practices in Farm Environment Plans, as proposed for managing phosphorus losses.	Accept in part the submission to manage sediment and phosphorus management measures as part of a Farm Environment Plan and good management practice but also include nitrogen to ensure that it is included in good management practices.
Beef + Lamb NZ Ltd	56727 pLWRP-230	Policy 13.4.11	Delete Policy 13.4.11 and replace with: 13.4.11	Support in part	Horticulture NZ supports the need for farming activities to operate at good management practice and an	Amend Policy 13.4.11 to remove the nitrogen cap and replace with requiring adoption of good

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>a) in the Upper Hinds/Hekeao Plains Area by</p> <p>i) Requiring all farming activities operate at good management practice: and</p> <p>ii) Requiring the adoption of nitrogen loss rates to meet catchment load, based on LUC, from 2025.</p> <p>b) In the lower Hinds Plains Area</p> <p>) Requiring all farming activities operate at good management practice: and</p> <p>ii) Requiring the adoption of nitrogen loss rates to meet catchment load, based on LUC, from 2025.</p>		<p>alternative allocation mechanism that includes consideration of vulnerability for soil leaching to avoid good soils being unable to be used because the allocation mechanism has allocated nitrogen to high leaching farming activities on soils with a higher propensity to leaching.</p> <p>Removal of the nitrogen cap in the Upper Hinds/Hekeao Plains Area is supported as N is not currently an issue in that Area and the issue can be managed through requiring adoption of good management practices.</p>	management practices to manage nutrient losses and an allocation mechanism that considers the vulnerability of the soil to leach.
DairyNZ	52271 V2 pLWRP-557	Policy 13.4.11	<p>Amend as follows:</p> <p>Maintain water quality in the Upper Hinds/Hekeao Plains Area by capping discharges of nitrogen at 144 tonnes of nitrogen per year and requiring all farming activities to operate at good management practice to <u>manage nutrient, microbial and sediment losses to maintain current phosphorus losses to achieve the limits in Table 13(ga).</u></p> <p>See submission for Table 13(ga).</p>	Support in part	Removal of the nitrogen cap in the Upper Hinds/Hekeao Plains Area is supported as N is not currently an issue in that Area and can be managed through requiring adoption of good management practices, as proposed for managing phosphorus losses.	Amend Policy 13.4.11 to remove the nitrogen cap and replace with requiring adoption of good management practices to manage nitrogen and phosphorus.
Central South Island Fish and Game Council	53274 V2 pLWRP-473	Policy 13.4.11	Delete Policy 13.4.11 and replace with a new policy which ensures that land use will be managed to ensure that the objective, limits/ targets set out in tables 13a) 13 g) and 13 j) will be achieved by 2050 for the objectives and 2030 for the loads. Nitrogen loads should be	Oppose	It is unclear from the submission what the new policy may be to achieve the objective, limits/ targets set out in tables 13a) 13 g) and 13 j) will be achieved by 2050 for the objectives and 2030 for the loads.	Reject the submission to delete Policy 13.4.11 and replace with a new policy which ensures that land use will be managed to ensure that the objective, limits/ targets set out in tables 13a) 13 g) and 13 j) will be

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			calculated based on the lasts required to achieve the instream DRP and DIN limits/ targets set out in the amended table 13 j).			achieved by 2050 for the objectives and 2030 for the loads.
Fonterra Co-operative Group Ltd	52333 V2 pLWRP-768	Policy 13.4.12	Amend as follows 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 3400 tonnes of nitrogen per year <u>70% of the catchment load contributed by farming activities as at 1 October 2014</u> by 2035.	Support in part	Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. The submitter also has concerns with the policy and seeks an alternative approach based on a % of the catchment load contributed by farming activities. It is important that the policy does not lock in a catchment load limit when there is considerable uncertainty as to its validity or when the calculation may change as a result of further investigative work or changes in OVERSEER. However a percentage reduction also needs to take account of the anticipated load from new schemes and intensification of 30,000 ha. Therefore adoption of any formula needs to take this into account.	Accept the submission to the extent that Policy 13.4.12 should be reviewed following further modelling to determine an appropriate catchment load, taking into account additional intensification in the catchment.
DairyNZ	52271 V2 pLWRP-558	Policy 13.4.12	Amend as follows 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 3400 tonnes of nitrogen per year <u>70% of the catchment load contributed by</u>	Support in part	Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. The submitter also has concerns with the policy and seeks an alternative approach based on a % of the	Accept the submission to the extent that Policy 13.4.12 should be reviewed following further modelling to determine an appropriate catchment load, taking into account additional intensification in the catchment.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p><u>farming activities as at 1 October 2014</u> by 2035.</p>		<p>catchment load contributed by farming activities.</p> <p>It is important that the policy does not lock in a catchment load limit when there is considerable uncertainty as to its validity or when the calculation may change as a result of further investigative work or changes in OVERSEER. However a percentage reduction also needs to take account of the anticipated load from new schemes and intensification of 30,000 ha. Therefore adoption of any formula needs to take this into account.</p>	
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-298	Policy 13.4.12	<p>The submitter seeks changes that either:</p> <ol style="list-style-type: none"> 1) Set a target percentage reduction in load, or 2) Require a recalculation of target load to maintain a similar percentage of reduction in N losses if subsequent more accurate data shows the base load is different than 4500 tonnes. 3) Require standardized approach to use of OVERSEER and its operation and development. 	Support in part	<p>Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. Currently the catchment load is based on 4500t and the 3400t was a percentage reduction.</p> <p>The submitter seeks that a recalculation of the target load be done if more accurate data shows that the base load is inaccurate. However there are queries as to the accuracy of the base load, and hence the target figure. Therefore further work needs to be undertaken before a target figure is locked into a Plan. The effects of further intensification also need to be taken into account.</p>	Accept the submission to the extent that Policy 13.4.12 should be reviewed following further modelling to determine an appropriate catchment load, taking into account additional intensification in the catchment.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					In addition changes sought by the submitter regarding the use of OVERSEER are supported as any change in OVERSEER requires both on-farm figures and the catchment load to be recalculated.	
Irrigation New Zealand	52278 V2 Plwrp-173	Policy 13.4.12	Amend Policy 13.4.12 as follows: Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen from farming activities to achieve a <u>groundwater concentration of 9.2mg/l by 2035 target load of 3400 tonnes of nitrogen per year by 2035</u> OR Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen from farming activities to achieve a <u>target load of 3400 tonnes of nitrogen per year by 2035 calculated using the following methodology</u>	Support in part	Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. Currently the catchment load is based on 4500t and the 3400t was a percentage reduction. The submitter seeks that a recalculation of the target load be done and this is supported as there are concerns about the accuracy of the base load of 4500t.	Accept the submission to the extent that Policy 13.4.12 should be reviewed following further modelling to determine an appropriate catchment load, taking into account additional intensification in the catchment.
Fish and Game Council Central South Island	53274 V2 pLWRP-474	Policy 13.4.12	Amend Policy 13.4.12 : Improve water quality in the <u>Lower Hinds/Hekeao Plains Area catchment</u> by reducing the discharge of nitrogen and phosphorus from farming activities to achieve a <u>target load of 3400 tonnes of nitrogen per year by 2035 the instream targets for DIN and DRP and their associated nutrient load targets as set out in amended table 13 g).</u>	Oppose	Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. The submission seeks an alternative approach based on DIN and DRP. However the effect of the proposal and how it would be implemented are uncertain.	Reject the submission and amend to provide for Policy 13.4.12 to be reviewed following further modelling to determine an appropriate catchment load, taking into account additional intensification in the catchment.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Fertiliser Assoc of NZ	56725 V2 pLWRP-820	Policy 13.4.12	Amend Policy 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 3400 tonnes of nitrogen per year by 2035	Support in part	The submitter seeks that the policy refers to 'nitrogen losses' from farming activities, rather than 'discharges of nitrogen'. This is supported as the issue is the loss of nitrogen so more accurately describes the issue.	Amend Policy 13.4.12 to refer to 'nitrogen losses' from farming activities, rather than 'discharges of nitrogen'.
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-633	Policy 13.4.12	Amend Policy 13.4.12: Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen from farming activities to achieve with the goal of achieving a target load of 3400 tonnes of nitrogen per year by 2035-xx . AND Amend the reference to 2035 with a target date that is derived from a comprehensive and detailed investigation that employs the methodology set out in Annexure A to this submission.	Support in part	Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. The submitter seeks a similar approach. In addition 2035 may not be an appropriate date when the results of further investigations are known.	Accept the submission to the extent that further investigations are undertaken and amendments made to the target load and date.
Dairy Holdings Ltd	53683 V2 pLWRP-986	Policy 13.4.12	Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen from farming activities to achieve with the goal of achieving a target load of 3400 tonnes of nitrogen per year by 2035 <u>2050</u> .	Support in part	Horticulture NZ has sought that 3400 t/N/yr be an interim target until further catchment modelling has determined an appropriate limit. 2035 may not be an appropriate date when the results of further investigations are known so the submission seeking it be amended to 2050 is appropriate.	Accept the submission to amend the target date to 2050, pending the outcomes of further investigations.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-637	Policy 13.4.13	Amend Policy 13.4.13 as set out in submission, including: -Reference target load to Policy 13.4.12 - applying reductions in nitrogen loss rates to all farming activities based on either stepped actual or % reductions derived from further investigations - limit intensification to x kg /yr Or alternative relief as set out in submission.	Support in part	<p>Policy 13.4.13 sets out how farming activities are to reduce nitrogen losses and achieve a target load as set out in Policy 13.4.12, by use of GMP's, further reductions for higher leachers and providing for land use change or intensification up to 30,000ha.</p> <p>Horticulture NZ submitted that the dates be amended and that the limit of 30,000 ha be removed.</p> <p>A number of submitters have sought extensive changes to the policy framework to provide greater flexibility for farming activities to achieve the targets.</p> <p>Horticulture NZ seeks an allocation mechanism that provides certainty and ensures that all farming activities reduce nitrogen losses to an agreed figure for the catchment, with that figure to be determined through further modelling and investigations. Sufficient time is also necessary for such changes to be made.</p> <p>The submission by RDR seeks a similar outcome and is supported to the extent that it provides for further work to be done to derive the numbers to be implemented through the policy.</p> <p>The submitter seeks reference to a new Schedule 24b to set out good</p>	<p>Accept submission in part and amend Policy 13.4.13 as follows: Farming activities including farm 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 3400 tonnes of nitrogen per year <u>work with the goal of achieving the targets set in in Policy 13.4.12 by:</u></p> <p>a) Requiring existing farming activities to implement meet <u>implement</u> good management practices <u>through a Farm Environment Plan as set out in Schedule 24a</u> nitrogen loss rates from 1 January 2017, calculated on the baseline land uses;</p> <p>b) Requiring further reductions in <u>nitrogen loss rates from farming activities for dairy farming and dairy support</u> from 1 January <u>2022</u> 2020 in accordance with x (with x to be determined as a result of catchment modelling)</p> <p>c) Enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000ha of land <u>provided the nitrogen loss</u></p>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					management practices, but reference to Schedule 24a and Farm Environment Plans would achieve a similar outcome and clarifies how good management practices are to be implemented. In respect of a) good management practices should be implemented regardless of the baseline loss rates	calculation is limited to no more than 27kg per hectare per year.
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP-661	Policy 13.4.13	Provide clarity in Policy 13.4.13 c) or by way of advisory note that the reference to 30,000 ha refers to new irrigation and not just intensification.	Support in part Oppose in part	Horticulture NZ seeks that there is not a limitation on the area of intensification provided that the loss rate is no more than 27kg/h/yr. This should not be limited to areas under new irrigation.	c) Enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000ha of land provided the nitrogen loss calculation is limited to no more than 27kg per hectare per year.
Irrigation NZ	52278 V2 pLWRP-174	13.4.13	The submitter seeks extensive changes to Policy 13.4.13 including: - reference to the methodology set out in Policy 13.4.12 - Implementing good management practices - collective reductions in nitrogen loss - Inclusion of an independent expert advisory panel to review consent applications with specified criteria	Support in part Oppose in part	As set out in respect of 56706 V2 pLWRP-637 Horticulture NZ supports amendments to Policy 13.4.13. An expert advisory panel could assist with advice to Environment Canterbury but the criteria should be limited to those matters over which the Council has control. All those undertaking farming activities that have high levels of nitrogen loss should be required to reduce losses but be provided with an appropriate timeframe in which it is to occur. However it is considered that such a panel should be included as a method, not a policy.	Amend Policy 13.4.13 as set out in respect to 56706 V2 pLWRP-637. Include as a method that Environment Canterbury may use and expert advisory panel to assist with advice about how properties may reduce nitrogen losses, including recognition of changes already made to reduce losses.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					It is appropriate that recognition be given to where an operation has already changes to reduce the levels of nitrogen losses from the baseline.	
Fish and Game Council Central South Island	53274 V2 pLWRP-484	Policy 13.4.13 c)	Amend Policy 13.4.13 c) c) Enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000ha of land provided the nitrogen loss calculation is limited to no more than 27kg per hectare per year and <u>provided the reduction of the total load by 45% by 2030 is still achieved.</u>	Oppose in part	Horticulture NZ supports the ability to change land use or intensify. The extent of such possible changes needs to be quantified through additional modelling, including the date by which the total load is to be achieved.	Accept Horticulture NZ submission to undertake further modelling to determine the load and date by which it should be achieved.
Federated Farmers Of NZ	51457 V2 pLWRP-292	Policy 13.4.13	The submitter seeks changes to Policy 13.4.13 to ensure that the target load is achievable in a cost effective manner and not disadvantaging some user and leading to inequities, particularly in regard to existing users and new intensification.	Support in part	It is important that an allocation mechanism does not lead to inequities.	Amend Policy 13.4.13 as set out in respect to 56706 V2 pLWRP-637.
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP-660	13.4.13 b)	Amend as follows: <u>...requiring further reductions in nitrogen loss rates for all farming activities for dairy farming and dairy support from 1 January 2020, in a fair and equitable way in accordance with Table 13(h)...</u>	Support in part	It is important that an allocation mechanism does not lead to inequities so regardless of the farming activity, higher emitters should make greater N loss reductions than lower emitters.	Amend Policy 13.4.13 as set out in respect to 56706 V2 pLWRP-637.
Lowcliffe Dairies Ltd	56722 V2 pLWRP-1229	Policy 13.4.13 c)	Amend the policies and rules which apply to existing land users, so that existing users are not disadvantaged	Support in part	The amount of further intensification affects the extent of reductions required by existing farms and there is uncertainty about how much of the	Amend Policy 13.4.13 as set out in respect to 56706 V2 pLWRP-637.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>compared with those who have intensified more recently.</p> <p>Specifically, address the potential inequity of existing last users having to reduce their N discharge below the 27kg N/ha/year which applies to new intensification/irrigation.</p>		<p>30,000ha is already "taken" by existing consents and hence what the effect of this policy might be on existing dischargers.</p> <p>Changes of land use or intensification should not be limited to land within irrigation schemes.</p>	
Synlait Milk Ltd	57791 V2 pLWRP - 235	Policy 13.4.14	<p>Amend to read:</p> <p>f) adverse effects on people and property from raised groundwater levels and higher flows are avoided. <u>In determining adverse effects, a high level of consultation with potentially affected people shall be undertaken.</u></p> <p>g) <u>Appropriate community groups are established and used as a mechanism for advising on construction of consented proposals, receiving feedback and providing recourse on any unforeseen effects.</u></p>	Support	<p>MAR and TSA are catchment mitigations that could be used to reduce nitrogen concentrations in spring fed waterbodies and groundwater. However there is still need for further investigative work to determine the efficacy and effects of such an approach. In particular there is potential for increased flows and levels to adversely affect drainage in the lower catchment in the autumn through to spring. While increasing flows is an important part of the solutions package the potential for conflict/adverse effects on farming needs to be both acknowledged and carefully managed. Consultation with the community and land owners during development of projects will be valuable.</p>	Amend 13.4.14 as sought by the submitter
Federated Farmers Combined Canterbury Branch	51457 V2 pLWRP - 293	Policy 13.4.14 e)	<p>Amend as follows:</p> <p>(e) there is not net loss of significant biodiversity habitat of indigenous biodiversity</p>	Support	<p>Proposed wording does not make grammatical sense.</p>	Accept the submission.

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Hinds Plains Land and Water Partnership	56730 V2 pLWRP - 303	Policy 13.4.14	Amend Policy 13.4.14 to enable other forms of mitigation that will assist in achieving the policy goals.	Support	Horticulture NZ has supported a submission by The director General of Conservation 53688 V2 pLWRP-459 to ensure that other mitigation methods are included in the Plan. Such mechanisms should not be limited to MAR or TSA.	Accept submission and include other mitigation methods as sought in submission 53688 V2 pLWRP-459.
Eiffleton Community Group Irrigation Scheme Inc	56799 V2 pLWRP - 1036	Policy 13.4.14	Amend Policy 13.4.14 by: -deleting 'enabling' and replace with 'have regard to' - amend 'avoidance' to 'overall net improvement' - ensure that existing irrigation schemes are able to continue	Support	The changes sought by the submitter seek to ensure that implementation of MAR or TSA do not adversely affect existing irrigation schemes. This is a matter that should be considered when any proposal for MAR or TSA is being considered.	Accept submission as sought by submitter.
Eiffleton Community Group Irrigation Scheme Inc	56799 V2 pLWRP - 1093	Policy 13.4.14 f)	The submitter seeks to ensure that 13.4.14 f) is given adequate consideration given the potential effects that MAR is likely to have.	Support	Horticulture NZ has supported submission 57791 V2 pLWRP – 235 that seeks to ensure that there is consultation with affected parties.	Amend 13.4.14 f) as sought by submission 57791 V2 pLWRP – 235 f) Adverse effects on people and property from raised groundwater levels and higher flows are avoided. <u>In determining adverse effects, a high level of consultation with potentially affected people shall be undertaken.</u>
Federated Farmers Combined Canterbury Branch	51457 V2 pLWRP-295	Policy 13.4.16	Amend as follows: Improve flows in spring-fed waterbodies and the Lower Hinds River/Hekeao to meet economic cultural, social and environmental outcomes in the Hinds/Hekeao Plains Area by requiring adherence to flow and allocation limits.	Support in part	All methods set out in Schedule 10 of the pLWRP should be available to calculate reasonable use. The reasonable use test methodologies of Schedule 10 were the result of considerable work during the development of the Natural	Accept the submission insofar as it requests that all the methods of Schedule 10 be available for the calculation of reasonable use.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p><u>and</u> limiting the volume and rate of abstraction on replacement water permits to reasonable use calculated in accordance with method <u>set out 4</u> in Schedule 10 and prohibiting increased use arising from the transfer of consented volumes of water within surface water catchments and the Valetta Groundwater Allocation Zone <u>unless there is environmental benefit from doing so.</u></p>		<p>Resources Regional Plan and there is no apparent reason why they should not be used under Variation 2.</p>	
Irrigation New Zealand Inc	52278 V2 pLWRP-179	Policy 13.4.16	<p>Amend as follows: Improve flows in spring-fed waterbodies and the Lower Hinds River/Hekeao to meet economic cultural, social and environmental outcomes in the Hinds/Hekeao Plains Area by requiring adherence to flow and allocation limits, <u>and</u> limiting the volume and rate of abstraction on replacement water permits to reasonable use calculated in accordance with method <u>4</u>2 in Schedule 10. and prohibiting increased use arising from the transfer of consented volumes of water within surface water catchments and the Valetta Groundwater Allocation Zone.</p>	<p>Support in Part Oppose in part</p>	<p>Although purporting to prohibit only those transfers that lead to increase water usage, the associated rules prohibit any transfer. There are circumstances when transfer will not have negative effects on water usage and may have positive in-stream effects. While this policy appears to recognise that, it does not follow through to the relevant rules. Transfer is generally something to be encouraged to provide for allocative efficiency. Prohibition would be contrary to Policy B3 of the NPS for Freshwater Management 2014.</p> <p>The provisions of the pLWRP provide an adequate framework for managing transfers and this part of Policy 13.4.16 is superfluous (and misleading).</p> <p>All of Schedule 10 should be used to calculate reasonable use so the change sought by the submitter in</p>	<p>Accept the submission insofar as it seeks deletion of the words:</p> <p>“and prohibiting increased use arising from the transfer of consented volumes of water within surface water catchments and the Valetta Groundwater Allocation Zone”</p>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					respect of Schedule 10 is not supported.	
Synlait Farms Ltd	56811 V2 pLWRP-1003	Policy 13.4.16	Amend Policy 13.4.16 to delete reference to Schedule 10 and replace with 'based on irrigated areas and rates'.	Oppose	There needs to be a robust process for determining reasonable use. The submission implies that it should be based on existing irrigated areas and rates. That may not lead to the most efficient allocation.	Reject submission to amend Policy 13.4.16.
Synlait Farms Ltd	56811 V2 pLWRP-1004	Policy 13.4.17	Amend Policy 13.4.17 to provide flexibility in how adaptive management is applied and used.	Support in part	Horticulture NZ has sought that Policy 13.4.17 be amended to provide for crop survival water and adequate reliability.	Amend 13.4.17 as sought by the submitter and Horticulture NZ to ensure adequate reliability for crop survival water.
Director General of Conservation	53688 V2 pLWRP-428	Policy 13.4.18	Amend Policy 13.4.18: In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020 , any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in Table 13(e) <u>until replaced by minimum flow and allocation limits introduced by a plan change.</u>	Support in part	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and existing takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	Amend Policy 13.4.18 to read: In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020 , any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in Table 13 e) <u>until there is a collaboratively developed flow and allocation regime that has been included in the plan through a schedule 1 RMA process.</u>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-487	Policy 13.4.18	<p>Amend Policy 13.4.18:</p> <p>In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020, any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in</p> <p><u>(i) Table 13 e); or</u></p> <p><u>(ii) any replacement to Table 13 e) that has been collaboratively developed and included in this Plan through a Schedule 1 RMA process.</u></p> <p>Include advice note stating:</p> <p><u>The replacement of an existing water permit that complies with the minimum flow and allocation limits referred to in Policy 13.4.18 and Table 13 e) will be a restricted discretionary activity under Rule 5.132.</u></p> <p>Include policy in the plan that commits the council to the plan change referred to in Variation 2</p>	Support in part	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13(e) prohibited activities. However, by limiting the term of Table 13(e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	Amend Policy 13.4.18 to read: In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020 , any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in Table 13 e) <u>until there is a collaboratively developed flow and allocation regime that has been included in the plan through a schedule 1 RMA process.</u>
Eiffelton Community Group Irrigation Scheme Inc	56799 V2 pLWRP-104	Policy 13.4.18	<p><i>Amend Policy 13.4.18:</i></p> <p>In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020, any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in</p> <p><u>(i) Table 13 e); or</u></p>	Support in part	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13(e) to 2020 and including Policy 13.4.19 the Council appears to have	Amend Policy 13.4.18 to read: In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020 , any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in Table 13 e) <u>until there is a collaboratively developed flow and allocation regime that has been</u>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p><u>(ii) any replacement to Table 13(e) that has been collaboratively developed and included in this Plan through a Schedule 1 RMA process.</u></p> <p>Include advice note stating: <u>The replacement of an existing water permit that complies with the minimum flow and allocation limits referred to in Policy 13.4.18 and Table 13 e) will be a restricted discretionary activity under Rule 5.132.</u></p>		inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	<u>included in the plan through a schedule 1 RMA process.</u>
Eiffelton Community Group Irrigation Scheme	56798 V2 pLWRP-1095	Policy 13.4.18	<p>Amend Policy 13.4.18 as follows: In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020, any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in Table 13 e) <u>until there is a collaboratively developed flow and allocation regime that has been included in the plan through a schedule 1 RMA process.</u></p>	Support	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13(e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	<p>Accept the submission to amend Policy 13.4.18.</p> <p>In the Lower Hinds/Hekeao Plains Area, with the exception of the Lower Hinds River/Hekeao, and until 30 June 2020, any water permit granted to replace an existing water permit will be subject to the minimum flow and allocation limits in Table 13 e) <u>until there is a collaboratively developed flow and allocation regime that has been included in the plan through a schedule 1 RMA process.</u></p>
Director General of Conservation	53688 V2 pLWRP-429	Policy 13.4.19	Delete Policy 13.4.19	Support	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered	Accept the submission

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	
Eiffelton Community Group Irrigation Scheme Inc	56799 V2 pLWRP-1039	Policy 13.4.19	Delete Policy 13.4.19	Support	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13(e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that	Accept the submission to delete Policy 13.4.19.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					currently only applies to new takes.	
Eiffelton Community Group Irrigation Scheme	56798 V2 pLWRP-1096	Policy 13.4.19	Delete Policy 13.4.19	Support	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	Accept the submission to delete Policy 13.4.19.
Nga Runanga and Te Runanga O Ngai Tahu	52233 V2 pLWRP-206	13.5 Rules	The submitter seeks an alternative allocation framework that is not based on grandparenting but specific bands of loss limits and activity status OR Such limits determined by soil type and land use modelling considering the total catchment loads for N set out in Variation 2	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation method but seeks that further modelling is undertaken to confirm the numbers and limits that should be used in the Plan. Such modelling should take into account soil type and land use as sought by the submitter	Undertake further modelling as sought by Horticulture NZ to confirm the numbers and limits and align with the approach sought by the submitter to determine limits by soil type and land use modelling.
Beef + Lamb NZ Ltd	56727 V2 pLWRP-231	13.5 Rules	The submitter seeks an alternative allocation framework that is based on natural capital for nutrient discharge allocation.	Support in part	Horticulture NZ seeks an alternative allocation method but seeks that further modelling is undertaken to confirm the numbers and limits that	Undertake further modelling as sought by Horticulture NZ to confirm the numbers and limits and align with the approach sought by

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					should be used in the Plan. Such modelling should take into account soil type and land use as sought by the submitter	the submitter to determine limits by soil type and land use modelling a possible allocation framework is provided in Appendix A – note that the slope class <15° is a proxy for possible biophysical considerations such as soil type/climate.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-286	13.5 Rules	Amend the Variation to require a recalibration process to align differing results, past, present and future, from either different versions of OVERSEER or different protocols or both to achieve equivalence. Reference Rules 13.5.13 – 13.5.23, Tables 13 g) and 13 j)	Support in part	It is important that it OVERSEER is used as a basis for calculating N losses then all related calculations including catchment load are recalculated to ensure consistency in approach.	Accept the submission.
Dairy Holdings Ltd	56683 V2 pLWRP-1007	13.5 Rules	Add a new rule 13.5.35A to provide for takes by a water user group subject to conditions.	Support	There should be the ability for a water user group to apply for a combined consent and to manage the take within the group.	Accept the submission to add a new rule 13.5.35A to provide for takes by a water user group subject to conditions.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-1269	13.5 Rules	Amend the Variation to require kg/N loss numbers throughout the plan for plan targets and limits that are based on OVERSEER calculations to be adjusted for OVERSEER updates.	Support	It is important that it OVERSEER is used as a basis for calculating N losses then all related calculations including catchment load are recalculated to ensure consistency in approach.	Accept the submission.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-1270	13.5 Rules	Farming enterprise: add rule regarding changes in properties included in farming enterprises.	Support in part/ Oppose in part	There needs to be clarity as to how farming enterprises are managed but they should not be disadvantaged by a number of properties being operated as a farming enterprise.	Clarify how farming enterprises will be managed within the rule framework and ensure that they are treated equitably with properties.
Director General of Conservation	53688 V2 pLWRP-431	Rule 13.5.7	Delete Rule 13.5.7 and replace rule with a 5.22 rule not to ensure no duplication occurs with EPA	Support	EPA have responsibility to approve agrichemicals that are suitable to be discharged into water and list	Accept the submission.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			requirements		conditions for their use. The pLWRP should not duplicate the EPA approval and conditions.	
Fish and Game Council Central South Island	53274 V2 pLWRP-506	Rule 13.5.8	<p>Delete Rule 13.5.8 and replace with rule that achieves outcomes and has range of controls.</p> <p>The submitter seeks an alternative allocation framework based on a flat per hectare allocation of N or and allowance based on LUC or some other mechanism which achieves efficient use of natural resources. An LUC table with leaching rates is included. (Refer to submission for details).</p> <p>The approach recognises a trajectory of improvement over time towards the desired state.</p> <p>The submission sets out a range of management practices that would be required, including a 6 m setback from water bodies for cultivation.</p> <p>Any activity that increases N leaching is a prohibited activity.</p> <p>Provide for a permitted activity status for production land use activities that have to demonstrate compliance with a standard that relies on modelled nitrogen leaching.</p> <p>(Refer to submission for details).</p>	Support in part Oppose in part	<p>Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p> <p>However Rule 13.5.8 is limited to properties less than 5 ha in the Upper Hinds/ Hekeao Plains Area where N losses is not the main issue and the proposed approach is not appropriate for Rule 13.5.8.</p>	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.
Ravensdown Fertiliser Co-operative Ltd	56708 V2 pLWRP-744	Rule 13.5.8	Amend Rule 13.5.8 by changing 'and' to 'or' so a property would need to meet either condition, not both.	Support in part	The change sought provides the ability for properties that have low leaching to be a permitted activity.	Accept the submission to amend Rule 13.5.8 by changing 'and' to 'or'.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Synlait Milk Ltd	54491 V2 pLWRP-239	Rule 13.5.9	Amend Rule 13.5.9 so that the nitrogen base line only applies until 1 January 2017 and post 1 Jan 2107 the GMP nitrogen loss rates are being achieved.	Support in part	The change sought would see a transition to GMP loss rates which reflect the land use and soil type. However there is no provision in the change sought for farming enterprises.	Accept submission to amend Rule 13.5.9 but include provision for farming enterprises.
Fish and Game Council Central South Island	53274 V2 pLWRP-507	Rule 13.5.9	<p>Delete Rule 13.5.9 and replace with rule that achieves outcomes and has range of controls.</p> <p>The submitter seeks an alternative allocation framework based on a flat per hectare allocation of N or and allowance based on LUC or some other mechanism which achieves efficient use of natural resources. An LUC table with leaching rates is included. (Refer to submission for details).</p> <p>The approach recognises a trajectory of improvement over time towards the desired state.</p> <p>The submission sets out a range of management practices that would be required, including a 6 m setback from water bodies for cultivation.</p> <p>Any activity that increases N leaching is a prohibited activity.</p> <p>Provide for a permitted activity status for production land use activities that have to demonstrate compliance with a standard that relies on modelled nitrogen leaching.</p> <p>(Refer to submission for details).</p>	Support in part Oppose in part	<p>Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p> <p>However Rule 13.5.9 is limited to properties in the Upper Hinds/ Hekeao Plains Area where N losses is not the main issue and the proposed approach is not appropriate for Rule 13.5.9.</p>	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Fish and Game Council Central South Island	53274 V2 pLWRP-524	Rule 13.5.9	Amend Rule 13.5.9 to controlled activity and covers both s9 and s15 land use and associated discharges. Delete grandparenting clause 1 and insert 20kg or LUC leaching rate.	Oppose	A permitted activity rule is appropriate subject to conditions.	Reject the submission to make Rule 13.5.9 a controlled activity.
Ravensdown Fertiliser Co-operative Ltd	56708 V2 pLWRP-746	Rule 13.5.9	Amend Rule 13.5.9 to include farming enterprises as a permitted activity.	Support	Where farming enterprises meet the permitted activity conditions they should be provided for as a permitted activity.	Accept submission to amend Rule 13.5.9 to include farming enterprises as a permitted activity.
Fish and Game Council Central South Island	53274 V2 pLWRP-508	Rule 13.5.10	Delete Rule 13.5.10 and replace with rule that achieves outcomes and has range of controls. The submitter seeks an alternative allocation framework based on a flat per hectare allocation of N or and allowance based on LUC or some other mechanism which achieves efficient use of natural resources. An LUC table with leaching rates is included. (Refer to submission for details). The approach recognises a trajectory of improvement over time towards the desired state. The submission sets out a range of management practices that would be required, including a 6 m setback from water bodies for cultivation. Any activity that increases N leaching is a prohibited activity. Provide for a permitted activity status for production land use activities that have to demonstrate compliance with a standard that relies on modelled	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses. The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices. However Rule 13.5.10 is limited to properties in the Upper Hinds/ Hekeao Plains Area where N losses is not the main issue and the proposed approach is not appropriate for Rule 13.5.9.	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			nitrogen leaching. (Refer to submission for details).			
Fish and Game Council Central South Island	53274 V2 pLWRP-528	Rule 13.5.10	Delete Rule 13.5.10	Oppose in part	In submission 53274 V2 pLWRP-508 the submitter sought that Rule 13.5.10 be deleted and replaced with an alternative framework. It is not clear which submission the submitter seeks.	Reject the submission.
Horticulture NZ	52267 V2 pLWRP-626	Rule 13.5.10	Delete Rule 13.5.10 and provide for farming enterprises in Rule 13.5.8 and 13.5.9 OR add a restricted discretionary activity for farming enterprises	Support	The submitter seeks to clarify that: Permitted activity status is sought for farming enterprises in the Upper Hinds/ Hekeao Plains Area where conditions of Rule 13.5.8 and 13.5.9 are met. If conditions are not met then the farming enterprise should be a restricted discretionary activity.	Provide for farming enterprises in Rules 13.5.8 and 13.5.9 as permitted activities. Amend Rule 13.5.10 to restricted discretionary rule where conditions of the PA rule for farming enterprises cannot be met.
Synlait Farms Ltd	56811 V2 pLWRP-1282	Rule 13.5.10	Amend Rule 13.5.10 to restricted discretionary	Support in part	Horticulture NZ has sought that farming enterprises be included in the permitted activity rules. Where the conditions cannot be met they should be a restricted discretionary activity.	Include farming enterprises in Rules 13.5.8 and 13.5.9 and amend Rule 13.5.10 to restricted discretionary.
Fish and Game Council Central South Island	53274 V2 pLWRP-509	Rule 13.5.11	Delete Rule 13.5.11 and replace with rule that achieves outcomes and has range of controls. The submitter seeks an alternative allocation framework based on a flat per hectare allocation of N or and allowance based on LUC or some other mechanism which achieves efficient use of natural resources. An LUC table with leaching rates is included. (Refer to submission for details).	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses. The management practices listed do	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>The approach recognises a trajectory of improvement over time towards the desired state.</p> <p>The submission sets out a range of management practices that would be required, including a 6 m setback from water bodies for cultivation.</p> <p>Any activity that increases N leaching is a prohibited activity.</p> <p>Provide for a permitted activity status for production land use activities that have to demonstrate compliance with a standard that relies on modelled nitrogen leaching.</p> <p>(Refer to submission for details).</p>		<p>not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p> <p>However Rule 13.5.11 is limited to properties in the Upper Hinds/ Hekeao Plains Area where N losses is not the main issue and the proposed approach is not appropriate for Rule 13.5.11</p>	
Fertiliser Assoc of NZ	56725 V2 pLWRP-827	13.5.11	Amend Rule 13.5.11.	Support in part	<p>Rule 13.5.11 applies to farming activities that do not comply with conditions 2 or 2 of Rule 13.5.9 or condition 3 of Rule 13.5.10.</p> <p>Rule 13.5.10 applies to farming enterprises so they should be specifically listed in Rule 13.5.11.</p>	<p>Amend Rule 13.5.11 as follows:</p> <p>The use of land for a farming activity <u>or a farming enterprise</u> that does not comply with conditions 2 or 3 of Rule 13.5.9 or condition 3 of Rule 13.5.10 is a discretionary activity.</p>
Fish and Game Council Central South Island	53274 V2 pLWRP-510	Rule 13.5.12	<p>Delete Rule 13.5.12 and replace with rule that achieves outcomes and has range of controls.</p> <p>The submitter seeks an alternative allocation framework based on a flat per hectare allocation of N or and allowance based on LUC or some other mechanism which achieves efficient use of natural resources. An LUC table with leaching rates is included. (Refer</p>	Support in part Oppose in part	<p>Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do</p>	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>to submission for details).</p> <p>The approach recognises a trajectory of improvement over time towards the desired state.</p> <p>The submission sets out a range of management practices that would be required, including a 6 m setback from water bodies for cultivation.</p> <p>Any activity that increases N leaching is a prohibited activity.</p> <p>Provide for a permitted activity status for production land use activities that have to demonstrate compliance with a standard that relies on modelled nitrogen leaching.</p> <p>(Refer to submission for details).</p>		<p>not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p> <p>However Rule 13.5.12 is limited to properties in the Upper Hinds/ Hekeao Plains Area where N losses is not the main issue and the proposed approach is not appropriate for Rule 13.5.12</p>	
Fertiliser Assoc of NZ	56725 V2 pLWRP-828	13.5.12	Amend Rule 13.5.12 to non-complying	Support.	<p>Rule 13.5.12 applies to farming activities that do not comply with condition 1 in Rule 13.5.9 or conditions 1 or 2 of Rule 13.5.10.</p> <p>Rule 13.5.10 applies to farming enterprises so they should be specifically listed in Rule 13.5.12.</p>	<p>Amend Rule 13.5.12 as follows:</p> <p>The use of land for a farming activity <u>or a farming enterprise</u> that does not comply with condition 1 of Rule 13.5.9 or conditions 1 or 2 of Rule 13.5.10 is a non-complying activity.</p>
Ravensdown Fertiliser Co-operative Ltd.	56708 V2 pLWRP-745	Rule 13.5.13	Amend Rule 13.5.13 by changing 'and' to 'or' so a property would need to meet either condition, not both.	Support in part	The change sought provides the ability for properties that have low leaching (under 20kg/h/yr) to be a permitted activity.	Accept the submission to amend Rule 13.5.13 by changing 'and' to 'or'.
Fish and Game Council Central South Island	53274 V2 pLWRP-511	Rule 13.5.13	Delete Rule 13.5.13 and replace with rule that achieves outcomes and has range of controls.	Support in part Oppose in	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>The submitter seeks an alternative allocation framework based on a flat per hectare allocation of N or and allowance based on LUC or some other mechanism which achieves efficient use of natural resources. An LUC table with leaching rates is included. (Refer to submission for details).</p> <p>The approach recognises a trajectory of improvement over time towards the desired state.</p> <p>The submission sets out a range of management practices that would be required, including a 6 m setback from water bodies for cultivation.</p> <p>Any activity that increases N leaching is a prohibited activity.</p> <p>Provide for a permitted activity status for production land use activities that have to demonstrate compliance with a standard that relies on modelled nitrogen leaching.</p> <p>(Refer to submission for details).</p>	part	<p>catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p> <p>However Rule 13.5.13 is limited to properties in the Lower Hinds/ Hekeao Plains Area where leaching is low so the proposed approach is not appropriate for Rule 13.5.13</p>	submission that seeks to require specific management practices and a prohibited activity rule.
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-653	Rule 13.5.14	The submitter seeks that the rule applies to the land within the Lower Hinds/ Hekeao Plains area rather than the farming activity or enterprise.	Support in part	The change sought is appropriate so that the land subject to the consent is within the Lower Hinds/ Hekeao Plains Area, not the farming activity or farming enterprise.	Amend Rule 13.5.14 as sought by the submitter.
Ravensdown Fertiliser Co-operative Limited	56708 V2 pLWRP-754	Rule 13.5.14	Delete Rule 13.5.14.	Oppose	Rule 13.5.14 provides for land use change or intensification on up to 30,000 ha of land. Deleting the rule would mean that there is no specific provision for such land use changes as anticipated in the ZIP Solution	Reject the submission to delete Rule 13.5.14.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					package. Such land use change should not be limited to land that is within the command area of a consented irrigation scheme, which is provided for in Rule 13.5.22. Therefore it is important to retain Rule 13.5.14 to provide for land outside of such schemes.	
Fish and Game Council Central South Island	53274 V2 pLWRP-513	Rule 13.5.14	Delete Rule 13.5.14 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses. The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.
Fish and Game Council Central South Island	53274 V2 pLWRP-537	Rule 13.5.14	Amend Rule 13.5.14 so that there is certainty the increased area that may be irrigated does not frustrate achievement of the target reduction in the load and instream concentrations	Oppose in part	The submitter has made two different submissions on Rule 13.5.14 so it needs to be clear which submission they support.	Reject submission to amend Rule 13.5.14.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP -322	Rule 13.5.15	Amend Variation 2 to provide for a flexibility cap (similar to the South Canterbury Coastal Streams proposal) and include in Rule 13.5.15.	Support in part	Rule 13.5.15 provides for low leaching properties within the Lower Hinds/ Hekeao Plains Area to increase up to a flexibility cap. Farming activity that has a low nitrogen discharge should not be	Accept the submission by amending condition 1 of Rule 13.5.15 as follows: The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					<p>limited to its nitrogen baseline but be allowed some flexibility to increase up to a cap as a permitted activity to allow for seasonal variation and to help maintain viability as circumstances change.</p> <p>The modelling sought by Horticulture NZ would assist in establishing the flexibility cap to be applied.</p>	<p>granted under Rule 13.5.14, does not increase above the nitrogen baseline <u>or x kgs per hectare per annum</u> whichever is the greater.</p> <p>The "flexibility cap" (indicated by "x") should be set at the limit that enables an achievable rate of N loss reduction to be set for those properties leaching above the threshold.</p>
Fish and Game Council Central South Island	53274 V2 pLWRP-514	Rule 13.5.15	Delete Rule 13.5.15 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	<p>Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p>	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.
Fish and Game Council Central South Island	53274 V2 pLWRP-538	Rule 13.5.15	Amend Rule 13.5.15 so that the permitted activity rule is clear and certain and not contain elements of subjectivity or discretion or require third party audit.	Oppose in part	The submitter has made two different submissions on Rule 13.5.15 seeking different outcomes so it needs to be clear which submission they support.	Reject submission to amend Rule 13.5.15.
Hinds Plains Land and Water	56730 V2 pLWRP -324	Rule 13.5.16	Amend Variation to provide for a flexibility cap (similar to the South Canterbury Coastal Streams proposal)	Support	Rule 13.5.16 provides for low leaching properties within the Lower Hinds/ Hekeao Plains Area to	Accept the submission by amending condition 2 of Rule

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Partnership			and include in Rule 13.5.16		<p>increase up to a flexibility cap. Farming activity that has a low nitrogen discharge should not be limited to its nitrogen baseline but be allowed some flexibility to increase up to a cap as a permitted activity to allow for seasonal variation and to help maintain viability as circumstances change.</p> <p>The modelling sought by Horticulture NZ would assist in establishing the flexibility cap to be applied.</p>	<p>13.5.16 as follows:</p> <p>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 <u>or x kgs per hectare per annum whichever is the greater.</u></p> <p>The “flexibility cap” (indicated by “x”) should be set at the limit that enables an achievable rate of N loss reduction to be set for those properties leaching above the threshold.</p>
Fish and Game Central South Island	52274 V2 pLWRP-515	Rule 13.5.16	Delete Rule 13.5.16 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	<p>Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p>	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.
Fish and Game Central South Island	52274 V2 pLWRP-539	Rule 13.5.16	Amend the Rule 13.5.16 so that the activity status is controlled and the rule covers both s9 and s15 land use and	Oppose	The submitter has made two different submissions on Rule 13.5.16 seeking different outcomes so it needs to be	Reject submission to amend Rule 13.5.16.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			associated discharges.		clear which submission they support. Controlled activity status is unnecessary for low leaching activities. 20kgs (or less) as a permitted activity threshold is below the LUC leaching rates (promoted by the submitter) for the LUC classes predominant in the Hinds/Hekeao Plains Area.	
KJ and MC Read	56668 V2 pLWRP-868	Rule 13.5.16	Amend 13.5.16 (1) by amending 'and' to 'or'.	Support	There should be the provision that either condition 1 or 2 applies, but not both.	Amend 13.5.16 (1) by amending 'and' to 'or'.
DairyNZ	52271 V2 pLWRP-578	Rule 13.5.16	Amend Rule 13.5.16 Condition 1 to 25kg per ha per annum	Support in part	A figure of 25kg per ha per annum is still low leaching and should be provided as a permitted activity	Amend Rule 13.5.16 Condition 1 to 25kg per ha per annum.
Synlait Milk Ltd	54491 V2 pLWRP-251	Rule 13.5.17	Amend Rule 13.5.17 as follows: From 1 January 2017, the use of land for a farming activity in 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 25 kgs 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; 3. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A.	Support in part	The restricted discretionary rule needs to apply to activities that do not meet Rule 13.5.16 and so Condition 2 should be deleted. The N leaching rate will be assessed as part of the consent application.	Accept the submission to amend Rule 13.5.7 except add farming enterprises and amend matters of discretion as sought by Horticulture NZ. 52267V2 pLWRP-632.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The content quality of, compliance with and auditing of the Farm Environmental 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 implementation of Good management Practices Nitrogen Loss Rates to be applied for the baseline land uses; and 4. For the period after 1 January 2020, the matters listed in Policy 13.4.13. Any nitrogen loss rates to be applied in accordance with Table 13 (h); and 5. The potential benefits of the activity to the applicant, the community and the environment. 			
Fish and Game Central South Island	52274 V2 pLWRP-516	Rule 13.5.17	Delete Rule 13.5.17 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	<p>Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses.</p> <p>The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.</p>	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Fish and Game Central South Island	52274 V2 pLWRP-543	Rule 13.5.17	Amend Rule 13.5.17 to include within the rule requirements to achieve the nitrogen reductions set out in table 13(h). Deletion of matters of discretion 3 and 4. Add a new matter of discretion: The impact of the activity in relation to achievement of the freshwater objectives/ limits and targets set in amended tables 13 a) 13 g) and 13 i)	Oppose	The submitter has made two different submissions on Rule 13.5.17 seeking different outcomes so it needs to be clear which submission they support.	Reject submission to amend Rule 13.5.17.
Synlait Milk Ltd	54491 V2 pLWRP-255	Rule 13.5.18	Amend Rule 13.5.18 to restricted discretionary and add matters of discretion.	Support	Horticulture NZ seeks provisions for farming enterprises as a permitted activity. A restricted discretionary rule for farming enterprises not meeting permitted activity is appropriate.	Amend Rule 13.5.18 to restricted discretionary and add matters of discretion.
Horticulture NZ	52267 V2 pLWRP-634	Rule 13.5.18	Delete Rule 13.5.18 and provide for farming enterprises in Rule 13.5.15-13.5.17 OR add a restricted discretionary activity for farming enterprises	Support	The submitter seeks to clarify that: Permitted activity status is sought for farming enterprises in the Lower Hinds/ Hekeao Plains Area where conditions of Rule 13.5.15, 13.5.16 or 13.5.17 are met. If conditions are not met then the farming enterprise should be a restricted discretionary activity.	Provide for farming enterprises in Rule 13.5.15, 13.5.16 or 13.5.17 as permitted activities. Amend Rule 13.5.18 to restricted discretionary rule where conditions of the PA rule for farming enterprises cannot be met and add matters of discretion relating to rotational nature of the operation and industry good management practices.
Fish and Game Central South Island	52274 V2 pLWRP-517	Rule 13.5.18	Delete Rule 13.5.18 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					recognises that current high leachers will require more time to adjust and reduce N losses. The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.	
Fish and Game Central South Island	52274 V2 pLWRP-546	Rule 13.5.18	Delete Rule 13.5.18	Oppose	Rule 13.5.18 specifically provides for farming enterprises.	Reject submission to delete Rule 13.5.18.
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-490	Rule 13.5.19	Amend Rule 13.5.19 to include farming enterprise	Support	Rule 13.5.19 should include farming enterprises where Rule 13.5.18 is not met.	Amend Rule 13.5.19 to include farming enterprise
Fish and Game Central South Island	52274 V2 pLWRP-518	Rule 13.5.19	Delete Rule 13.5.19 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses. The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.
Fish and Game Central South Island	52274 V2 pLWRP-548	Rule 13.5.19	Retain Rule 13.5.19.	Oppose	The submitter has made two different submissions on Rule 13.5.19 seeking different outcomes so it needs to be	Reject submission to amend Rule 13.5.19.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					clear which submission they support.	
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-494	Rule 13.5.20	Amend Rule 13.5.19 to include farming enterprise	Support	Rule 13.5.20 should include farming enterprises where Rule 13.5.19 is not met.	Amend Rule 13.5.20 to include farming enterprise
Fish and Game Central South Island	52274 V2 pLWRP-519	Rule 13.5.20	Delete Rule 13.5.20 and replace with a rule that requires farms to comply with a sustainable leaching rate on basis of either a flat per hectare leaching rate or on the basis of LUC.	Support in part Oppose in part	Horticulture NZ seeks an alternative allocation mechanism based on further modelling work in the catchment and requiring improvements over time by all farming activities to a desired leaching rate. Such an approach recognises that current high leachers will require more time to adjust and reduce N losses. The management practices listed do not cover the range of mechanisms available or enable the use of appropriate mechanisms – rather prescribing certain practices.	Accept in part the submission for an alternative allocation mechanism for nitrogen but reject the part of the submission that seeks to require specific management practices and a prohibited activity rule.
Fish and Game Council Central South Island	53274 V2 pLWRP-551	Rule 13.5.20	Retain Rule 13.5.20	Oppose in part	The submitter has made two different submissions on Rule 13.5.20 seeking different outcomes so it needs to be clear which submission they support.	Reject submission to amend Rule 13.5.20
Irrigation NZ	52278 V2 pLWRP-193	Rule 13.5.20	Amend Rule 13.5.20 by deleting 'prohibited' and substituting 'non-complying'	Support	A non-complying activity status is more appropriate.	Amend Rule 13.5.20 by deleting 'prohibited' and substituting 'non-complying'
Fish and Game Council Central South Island	53274 V2 pLWRP-553	Rule 13.5.21	Delete Rule 13.5.21	Oppose	Rule 13.5.21 is necessary to provide for where an irrigation scheme has discharge consent granted for the scheme.	Reject submission and retain Rule 13.5.21.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Federated Farmers Combined Canterbury Branch	51457 V2 pLWRP-332	Rule 13.5.22	Delete Condition 3	Oppose	Rule 13.5.22 needs to take into account consents granted under Rule 13.5.14 as changes in land use should not be limited to irrigation companies.	Reject the submission to delete Rule 13.5.22 Condition 3.
Effielton Community Irrigation Scheme	56798 V2 pLWRP-1319	Rule 13.5.22	Delete Condition 3	Support	Rule 13.5.22 needs to take into account consents granted under Rule 13.5.14 as changes in land use should not be limited to irrigation companies.	Reject the submission to delete Rule 13.5.22 Condition 3.
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-529	Rule 13.5.23	Amend Rule 13.5.23 by deleting 'prohibited' and substituting 'non-complying.'	Support	A non-complying activity status is appropriate.	Amend Rule 13.5.23 by deleting 'prohibited' and substituting 'non-complying.'
Effielton Community Irrigation Scheme	56798 V2 pLWRP-1304	Rule 13.5.24	Retain Rule 13.5.24	Support	Rule 13.5.24 provides for land use activities associated with discharges authorised by Rules 13.5.8 – 13.5.20. It is important that these are provided for.	Retain Rule 13.5.24
Mayfield Hinds Irrigation Ltd	56723 V2 pLWRP-411	Rule 13.5.30 condition 1	Delete Rule 13.5.30 OR Amend Rule 13.5.30(1) by deleting "Method 1 in"	Support	Schedule 10 provides three accepted methods by which "reasonable use" can be calculated. It is inappropriate to limit this to method 1 in this rule.	Accept submission by deleting the words "Method 1 in".
Mayfield Hinds Irrigation Ltd	56723 V2 pLWRP-412	Rule 13.5.31	Amend Rule 13.5.31 matter of discretion (1) by deleting "Method 1 in"	Support	Schedule 10 provides three accepted methods by which "reasonable use" can be calculated. It is inappropriate to limit this to method 1 in this rule.	Accept submission by deleting the words "Method 1 in". Rule 13.5.31 matters of discretion 1
Effielton Community Irrigation Scheme	56798 V2 pLWRP-1103	Rule 13.5.31	Amend to ensure that more is done to allow transfer of surface water takes to groundwater	Support	There should be incentives to move surface water takes to groundwater.	Accept submission.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Eiffelton Community Group Irrigation Scheme Inc	56799 V2 pLWRP-1062	Rule 13.5.31 Condition 1.	Delete the words <i>"The groundwater take will be abstracted on the same property as the existing resource consent and"</i> OR Re-write condition to refer to water use rather than "take" and "abstracted"	Support	Benefits can accrue even if the groundwater will be abstracted from a different property from that where the existing surface water take is to be surrendered.	Accept submission.
Eiffelton Community Irrigation Scheme	56798 V2 pLWRP-1063	Rule 13.5.32	Amend activity status of Rule 13.5.32 from prohibited to noncomplying.	Support	A non-complying status is appropriate.	Amend activity status of Rule 13.5.32 from prohibited to noncomplying.
Fish and Game Council Central South Island	53274 V2 pLWRP-396	Table 13a	Amend Table 13 a) to set instream water quality characteristics and outcomes that will achieve the management objectives for the values of each water body	Oppose	The submitter does not specify the changes sought.	Reject the submission
Fish and Game Council Central South Island	53274 V2 pLWRP-503	Table 13a	Amend Table 13 a) so that: - it identifies the values of the water bodies - It includes all relevant freshwater objectives to achieving the desired outcome for each values, such as seasonal temperature, DIN, DIP, clarity, Nitrate and other toxicants, pH - Objectives are better suited for protecting the identified values, in particular temperature, fine sediment and chlorophyll	Oppose in part	The table should be consistent with the NPSFM and reflect the values for the Hinds /Hekeao Plains catchment.	Ensure the table is consistent with the NPSFM.
Fish and Game Council Central South Island	53274 V2 pLWRP-504	Table 13d)	Amend Table d) - That if minimum flow does not meet the depth predictions it will be reviewed in 5 years	Oppose in part	The matters sought are policy matters and should not be included in the table.	Reject submission.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<ul style="list-style-type: none"> - Apply fair sharing of water between instream and out of stream users as flows approach minimum - Include a new column that specified a reduced allocation goal. 			
Irrigation New Zealand Inc	52278 V2 pLWRP- 185	Table 13(e)	In Table 13 e) delete reference to '2020' and replace with '2035'	Support in part	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13(e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and existing takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	Delete reference to <i>1 October 2014-30 June 2020</i> in Table 13 e) Include advice note stating: <u>The replacement of an existing water permit that complies with the minimum flow and allocation limits referred to in Policy 13.4.18 and Table 13 e) will be a restricted discretionary activity under Rule 5.123.</u>
Federated Farmers Combined Canterbury Branch	51457 V2 pLWRP-309	Table 13(e)	Delete the words " <i>1 October 2014 - 30 June 2020</i> " from the heading of columns 4 and 5 of Table 13 e).	Support	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy	Accept the submission to delete the words " <i>1 October 2014 - 30 June 2020</i> " from the heading of columns 4 and 5 of Table 13 e).

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	
Director General of Conservation	53688 V2 pLWRP-467	Table 13(e)	Delete <i>1 October 2014-30 June 2020</i> from the heading of Table 13 e) Otherwise retain Table 13 e)	Support in part	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	Delete reference to <i>1 October 2014-30 June 2020</i> in Table 13 e)
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-488	Table 13(e)	In Table 13 e) delete reference to <i>1 October 2014-30 June 2020</i> Include advice note stating: <u>The replacement of an existing water permit that complies with the minimum</u>	Support in part	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in	Delete reference to <i>1 October 2014-30 June 2020</i> in Table 13 e) Include advice note stating: <u>The replacement of an existing water permit that complies with the</u>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<u>flow and allocation limits referred to in Policy 13.4.18 and Table 13 e) will be a restricted discretionary activity under Rule 5.132</u>		accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	<u>minimum flow and allocation limits referred to in Policy 13.4.18 and Table 13 e) will be a restricted discretionary activity under Rule 5.132</u>
Fish and Game Council Central South Island	53274 V2 pLWRP-505	Table 13 e)	Retain Table 13(e) and review in 2020.	Oppose	It is noted that Variation 2 as drafted will mean replacements of existing water permits processed under section 124-124C will be considered restricted discretionary activities in accordance with Rule 5.123, and until 2020 new takes not meeting the limits in Table 13 e) prohibited activities. However, by limiting the term of Table 13 e) to 2020 and including Policy 13.4.19 the Council appears to have inadvertently created a regime where new takes post 2020 become non-complying activities (under Rule 5.124) and exiting takes, in accordance with Policy 13.4.19, will become subject to the default flow and allocation regime from the regional rules (in Rule 5.123(2)) that currently only applies to new takes.	Delete reference to <i>1 October 2014-30 June 2020</i> in Table 13 e)

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Irrigation New Zealand Inc	52278 V2 pLWRP- 207	Table 13 f)	Delete Table 13 f) Ashburton Section Groundwater Limits/ targets Replace with new allocation table (to be provided at hearing)	Support in part	The submitter seeks changes to the groundwater limits/ targets. If there is science to support such changes then they should be considered.	Accept the submission.
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP- 405 And V2 pLWRP- 683 V2 pLWRP- 684	Table 13 f)	Provide a higher allocation limit for the Mayfield Hinds Groundwater Zone Add separate allocation block for deep groundwater	Support	A separate block for deep groundwater is supported.	Add separate allocation block for deep groundwater
Upper Hinds Plains Land User Group	56730 V2 pLWRP -973	Table 13 g)	Insert a new Table of concentration objectives/limits for the Upper Hinds/Hekeao Plains Area	Support	Specification of concentration objectives/limits is more appropriate in the Upper Hinds/Hekeao Plains Area than a nitrogen load limit. These limits should be set in light of the National Policy Statement for Freshwater 2014	Accept the submission
DairyNZ	522271 V2 pLWRP-594, 595 & 596.	Table 13 g)	Delete the N load limit for the Upper Hinds/Hekeao Plains Area and replace the fixed load limit for the Lower Plains Hinds/Hekeao Plains Area with a formula of 70% of the current N load contributed from farming activities. Include new proposed Table 13 ga) with concentration objectives/limits for the Upper Hinds/Hekeao Plains Area.	Support in part	Water quality issues in the Upper Hinds are related to sediment, phosphorus and E.coli issues rather than nitrogen. The risks associated with nitrogen concentrations in-stream do need to be managed (alongside other contaminants that adversely affect values). The load limit is not based on a comprehensive assessment of the catchment load. While this assessment is completed instream concentration limits can be applied and the risks from N loss managed	Accept the submissions provided: <ul style="list-style-type: none"> 1) that the limits proposed in the Table 13ga reflect the values identified for the catchment and are consistent with the NPSFM. 2) accept the submission in relation to the N load limit for the Upper Hinds. 3) that the load is established when

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					<p>through the Schedule 24a and Farm Environment Plan mechanisms and through specification of freshwater objectives (contaminant concentrations). Horticulture New Zealand supports the use of water quality concentrations for Upper Hinds but would like to see these limits set in line with the National Policy Statement for Freshwater 2014.</p> <p>The proposed "fixed" N load limit in the Lower Hinds/Hekeao Plains Area is inappropriate given that (a) it is based on an assessment of current load that is uncertain and which may change over time (uncertainty for example, due to updating of OVERSEER); and (b) because it hasn't been validated in an integrated catchment model to determine the attenuation relationship between load and water quality outcomes. Horticulture New Zealand believe-the understanding of the 2013-2014 load will evolve over time and the relationship with water quality predictions needs to be established, as such the N load limit needs to be expressed in such a way that it too may change through review (5 yearly).</p> <p>Without a load applied to the catchment in conjunction with water quality limits there is not a mechanism to apply through the</p>	<p>appropriate data is available and an integrated catchment model is used to develop a relationship to predict water quality outcomes.</p> <p>4) Accept the submission in respect to the N load limit for the lower Hinds/Hekeao Plains Area by replacing the 3400 tonnes N load limit with a load limit specified as 70% of the current load and this value is reviewed when an appropriate catchment load is established and examined in a load to water quality relationship.</p>

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					Schedule 24a and Farm Environment Plan mechanisms to manage the catchment to achieve the values sought in the Hinds/Hekeao Plains catchment.	
Irrigation New Zealand Inc	52278 V2 pLWRP-208	Table 13 g)	Delete the N load limit for the Upper Hinds/Hekeao Plains Area (114 tonnes) Delete the N load limit for the Lower Hinds/Hekeao Plains Area and replace with a concentration OR a target load methodology	Support	Water quality issues in the Upper Hinds are related to sediment, phosphorus and E.coli issues rather than nitrogen. The risks associated with nitrogen concentrations in-stream do need to be managed (alongside other contaminants that adversely affect values) The load limit is not based on a comprehensive assessment of the catchment load. While this assessment is completed in stream concentration limits can be applied and the risks from N loss managed through the Schedule 24a and Farm Environment Plan mechanisms and through specification of freshwater objectives (contaminant concentrations). Horticulture New Zealand supports the use of water quality concentrations for Upper Hinds but would like to see these limits set in line with the National Policy Statement for Freshwater 2014. The proposed-"fixed" N load limit in the Lower Hinds/Hekeao Plains Area is inappropriate given that (a) it is based on an assessment of current	Accept the submissions provided: <ol style="list-style-type: none"> 1) that the limits proposed in the Table 13ga reflect the values identified for the catchment and are consistent with the NPSFM. 2) accept the submission in relation to the N load limit for the Upper Hinds. 3) that the load is established when appropriate data is available and an integrated catchment model is used to develop a relationship to predict water quality outcomes. 4) Accept the submission in respect to the N load limit for the lower Hinds/Hekeao Plains Area by replacing the 3400 tonnes N load limit with a load limit specified as 70% of the current load and this value is reviewed when an appropriate catchment

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
					<p>load that is uncertain and which may change over time (uncertainty for example, due to updating of OVERSEER); and (b) because it hasn't been validated in an integrated catchment model to determine the attenuation relationship between load and water quality outcomes. Horticulture New Zealand believe-the understanding of the 2013-2014 load will evolve over time and the relationship with water quality predictions needs to be established, as such the N load limit needs to be expressed in such a way that it too may change through review (5 yearly).</p> <p>Without a load applied to the catchment in conjunction with water quality limits there is not mechanism to apply through the Schedule 24a and Farm Environment Plan mechanisms to manage the catchment to achieve the values sought in the Hinds/Hekeao Plains catchment.</p>	load is established and examined in a load to water quality relationship
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-302	Table 13 g)	Amend the Upper Hinds limit in Table 13 g) to provide for the updating of load limit to reflect more recent, better data on base load	Support	Horticulture NZ supports further modelling work so the numbers in the table are more robust.	Amend the Upper Hinds limit in Table 13 g) to provide for the updating of load limit to reflect more recent, better data on base load
Hinds Plains Land and Water Partnership	56730 V2 pLWRP-347	Table 13 g)	Amend Table 13 g) to require N loss rates based on OVERSEER to be adjusted with OVERSEER version and protocol changes	Support	Provision needs to be made for adjustments based on changes in OVERSEER.	Amend Table 13 g) to require N loss rates based on OVERSEER to be adjusted with OVERSEER version and protocol changes

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP- 368 And V2 pLWRP- 371	Table 13 g)	Replace N load target for Lower Hinds Plains area and increase the period of time over which the target is to be met.	Support	Horticulture NZ supports further modelling work so the numbers in the table are more robust.	Replace N load target for Lower Hinds Plains area and increase the period of time over which the target is to be met
Fish and Game Council Central South Island	53274 V2 pLWRP-562	Table 13 g)	Amend Table 13 g) so that it includes loads that are calculated to achieve set concentrations for DIN and DRP in amended table 13 j)	Oppose	Table 13 g) relates to total nitrogen losses from farming activities. Further modelling and investigation is required in both Upper and Lower Hinds before either entire catchment loads or instream target concentrations are set. It is important to note the attenuation and differences between a catchment load for farming and the relationship with an instream DIN and DRP which are not directly proportional.	Reject submission
Barrhill Chertsey Irrigation Scheme	56731 V2 pLWRP-532	Table 13 g)	Amend Table 13 g)	Support in part		Amend table as sought by submitter
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-709	Table 13 g)	Amend Table 13 g) by deleting reference to target annual discharge rate of 3400 t/N/yr and replace with date and figure derived from a comprehensive and detailed investigation.	Support	Horticulture NZ supports further modelling work so the numbers in the table are more robust.	Amend Table 13 g) by deleting reference to target annual discharge rate of 3400 t/N/yr and replace with date and figure derived from a comprehensive and detailed investigation.
DairyNZ	52271 V2 pLWRP - 597	Table 13 h)	Amend Table 13 h) so that: <ul style="list-style-type: none"> Farming activities with a nitrogen loss calculation for a property of greater than 25kg/ha/yr are 	Support in part	Horticulture NZ supports the need to ensure that all farming activities which are high emitters should reduce N losses. However the	Accept the submission in part to the extent that Table 13 h) applies to all farming activities but a stepped

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
			<p>required to reduce N loss by 15%, 22% and 30% from GMP by 2025, 2030 and 2035 respectively; and</p> <ul style="list-style-type: none"> Farming activities with a nitrogen loss calculation for a property of less than 25kg/ha/yr are not required to reduce N loss beyond GMP. 	Oppose in part	framework to achieve such reductions should be overtime to an agreed benchmark and not a blanket % reduction. Further modelling sought will derive the figures that need to be met in Table 13 h)	reduction is sought rather than a blanket % reduction.
Fonterra	52333 V2 pLWRP - 808	Table 13 h)	<p>Amend Table 13 h) so that:</p> <ul style="list-style-type: none"> Farming activities with a nitrogen loss calculation for a property of greater than 25kg/ha/yr are required to reduce N loss by 15%, 22% and 30% from GMP by 2025, 2030 and 2035 respectively; and Farming activities with a nitrogen loss calculation for a property of less than 25kg/ha/yr are not required to reduce N loss beyond GMP. 	Support in part Oppose in part	Horticulture NZ supports the need to ensure that all farming activities which are high emitters should reduce N losses. However the framework to achieve such reductions should be overtime to an agreed benchmark and not a blanket % reduction. Further modelling and the submission of Beef and Lamb NZ sought will derive the figures that need to be met in Table 13 h).	Accept the submission in part to the extent that Table 13 h) applies to all farming activities but a stepped reduction is sought rather than a blanket % reduction.
Rangitata Diversion Race	56706 V2 pLWRP - 710	Table 13 h)	Delete Table 13 h) and replace it with a new table that focuses on all agricultural and horticultural activities in the Plains, and that employs % reductions or actual reductions that are carefully derived using the methodology that is set out in Annexure A to this submission	Support in part	<p>Horticulture NZ supports a stepped reduction regime rather than a blanket % reduction.</p> <p>Therefore the approach of the submitter to develop robust reductions is supported.</p> <p>Reduction obligations should be shouldered across all contributors with the highest reductions to be achieved by the highest emitters regardless of the land use type/ farming system.</p>	Accept the submission to delete Table 13 h) and replace it with a new table that focuses on all agricultural and horticultural activities in the Plains, and that employs stepped % or actual reductions that are carefully derived taking into account soil type and requiring the highest reductions to occur from the highest leaching activities.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Valetta Irrigation Ltd	56723 V2 pLWRP - 669	Table 13 h)	Amend Table 13 h) to require reduction in N loss from all farming activities down to a specified level; and decrease percentage reductions and extend the time period.	Support in part	Horticulture NZ supports the need to ensure that all farming activities which are high emitters should reduce N losses. However the framework to achieve such reductions should be overtime to a specified level and not a blanket % reduction. Further modelling sought will derive the figures that need to be met in Table 13 h)	Accept the submission in part to the extent that Table 13 h) applies to all farming activities but a stepped reduction is sought rather than a blanket % reduction.
Hinds Plains Land and Water Partnership	56730 V2 pLWRP - 351	Table 13 h)	<p>Require N loss rates based on OVERSEER to be adjusted with OVERSEER version and protocol changes-</p> <p>Remove "dairy" and "dairy support" categories.</p> <p>Plan amended to require continuation of provisions for no increase of baseline losses until GMP and MGM definitions released.</p> <p>Plan then needs to be reviewed to adopt calculated farm reduction targets once GMP and MGM have been defined and released.</p> <p>Plan also needs to review and set timetables for reduction once relative capabilities for reduction established.</p> <p>Table needs to include permitted activity provisions of 13.5.16 in regard to 20kg.</p> <p>Plan to require a target of 30% of reduction in N loss rates by 2035 with a lower limit for reductions of 27kg/ha.</p>	Support in part	Horticulture NZ supports the need to ensure that all farming activities which are high emitters should reduce N losses. However the framework to achieve such reductions should be overtime to a specified level and not a blanket % reduction. Further modelling sought will derive the figures that need to be met in Table 13 h)	Accept the submission in part to the extent that Table 13 h) applies to all farming activities but a stepped reduction is sought rather than a blanket % reduction.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Dairy Holdings Ltd	53683 V2 pLWRP - 1011	Table 13 h)	Include a policy or rule that ensures that any reference to a percent reduction in N loss (as well references to any other targets/limits) remain appropriate – including the possibility of a further plan change following the comprehensive and detailed investigation (i.e. while ensuring farming activities can retain an acceptable level of profitability).	Support in part	Horticulture NZ seeks further modelling and investigations to ensure that the numbers in Table 13 h) are robust.	Accept the submission to the extent that Table 13 h) needs to be reviewed following modelling and investigations to ensure that the numbers in Table 13 h) are robust.
Fish and Game Council Central South Island	53274 V2 pLWRP-563	Table 13 j)	Amend Table 13 j): - Delete any reference to concentrations based on toxicity - Replace with much lower DIN concentrations and new DRP concentrations at levels based on life supporting capacity, ecosystem health and the values to be managed and protected	Oppose	The submitter does not state the numbers sought	Reject the submission.
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP- 672	Table 13 j)	Amend targets and limits within Table 13 j) to ensure they are set at a level that assumes 30,000ha additional irrigation at current operation practice with 5 yearly reviews	Support in part	It needs to be clear if additional 30,000ha has been incorporated into the Table 13 j) figures.	Amend targets and limits within Table 13 j) to ensure they are set at a level that assumes 30,000ha additional irrigation at current operation practice with 5 yearly reviews
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-711	Table 13 j)	Amend Table 13 j) by deleting reference to 2035and replace with date derived from a comprehensive and detailed investigation.	Support	Horticulture NZ supports further modelling work so the numbers in the table are more robust.	Amend Table 13 j) by deleting reference to 2035and replace with date derived from a comprehensive and detailed investigation.
Dairy NZ	52271 V2 pLWRP-1241	Table 13 j)	Move Tables 13 j) and k) so the relevant attributes are includes in Table 13a as freshwater objectives	Support in part	The tables should be consistent with the NPSFM with relevant attributes expressed as freshwater objectives.	Ensure the tables should be consistent with the NPSFM.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP- 387 V2 pLWRP- 675	Table 13 k)	Amend targets and limits within Table 13 k) to ensure they are set at a level that assumes 30,000ha additional irrigation at current operation practice with 5 yearly reviews	Support in part	It needs to be clear if additional 30,000ha has been incorporated into the Table 13 k) figures.	Amend targets and limits within Table 13 k) to ensure they are set at a level that assumes 30,000ha additional irrigation at current operation practice with 5 yearly reviews.
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-712	Table 13 k)	Amend Table 13 k) by deleting reference to 2035 and replace with date derived from a comprehensive and detailed investigation.	Support	Horticulture NZ supports further modelling work so the numbers in the table are more robust.	Amend Table 13 k) by deleting reference to 2035 and replace with date derived from a comprehensive and detailed investigation.
Dairy NZ	52271 V2 pLWRP-1242	Table 13 k)	Move Tables 13 j) and k) so the relevant attributes are included in Table 13a as freshwater objectives	Support in part	The tables should be consistent with the NPSFM with relevant attributes expressed as freshwater objectives.	Ensure the tables should be consistent with the NPSFM.
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-623	13.10 Schedules	Add a new Schedule 24 b) Good Management practice and populate it with the protocol attaches as Annex B to this submission	Support in part	Horticulture NZ supports good management practice being included however the industry agreed Good Management Practices determined through the MGM process should form the basis of these.	When MGM GMP is defined include this in as schedule 24b.
Synlait Milk Ltd	54491 V2 pLWRP-271	Schedule 7 Farm Environment Plan	Amend Schedule 7 as set out in submission In part B Clause 5a Delete 'Achieve the Good management practice nitrogen Loss rates from 2017 and replace with Implement Good Management Practices	Support in part	Changes should be made to Schedule 7 consistent with other changes to the Plan	Amend Schedule 7 consistent with other changes to the Plan In part B Clause 5a Delete 'Achieve the Good management practice nitrogen Loss rates from 2017 and replace with Implement Good Management Practices
Mayfield Hinds Irrigation Ltd	56712 V2 pLWRP- 389	Schedule 7 Farm Environment Plan	Delete the amendment in Schedule 7 that includes reference to Table 13 h)	Support in part	Changes should be made to Schedule 7 consistent with other changes to the Plan	Amend Schedule 7 consistent with other changes to the Plan

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Fish and Game Council Central South Island	53274 V2 pLWRP-526	Schedule 7 Farm Environment Plan	Amend Schedule 7 and 24 a) to ensure OVERSEER assumptions are mandatory requirements and process meets certainty and objectivity requirements	Oppose in part	Horticulture NZ has concerns about how OVERSEER is being applied and there needs to be explicit recognition that numbers need to be updated if OVERSEER or protocols change.	Reject submission but ensure that numbers in the Plan can be updated if OVERSEER or protocols change.
Fish and Game Council Central South Island	53274 V2 pLWRP-567	Schedule 7 Farm Environment Plan	Amend to include 50 m setback (at a minimum) from important waterbodies and to limit nitrogen loading and application depth and rate dependent on soil type and the quality of the receiving environment.	Oppose in part Support in part	A mandatory setback is not supported but recognition of soil type should be part of developing a FEP.	Reject submission to include mandatory setback.
Rangitata Diversion Race Management Ltd	56706 V2 pLWRP-713	Schedule 7 Farm Environment Plan	The submitter seeks alternative relief if submissions to include new Schedule 24 b) and definition are not accepted Including stepped reductions in place of Table 13 h)	Support in part	Horticulture NZ supports stepped reductions derived from further investigations and modelling.	Include stepped reductions in place of Table 13 h)
Fish and Game Council Central South Island	53274 V2 pLWRP-527	Schedule 24 a) Farm Practices	Amend Schedules 7 and 24 a) to ensure OVERSEER assumptions are mandatory requirements and process meets certainty and objectivity requirements	Oppose in part	Horticulture NZ has concerns about how OVERSEER is being applied and there needs to be explicit recognition that numbers need to be updated if OVERSEER or protocols change.	Reject submission but ensure that numbers in the Plan can be updated if OVERSEER or protocols change.
Fish and Game Council Central South Island	53274 V2 pLWRP-568	Schedule 24 a) Farm Practices	Amend to include 50 m setback (at a minimum) from important waterbodies and to limit nitrogen loading and application depth and rate dependent on soil type and the quality of the receiving environment.	Oppose in part Support in part	A mandatory setback is not supported but recognition of soil type should be part of developing a FEP.	Reject submission to include mandatory setback.

Submitter Name	Submission Number	Variation 2 reference	Submission	Support/ Oppose	Reasons	Relief Sought
Effielton Community Irrigation Scheme	56798 V2 pLWRP-1072	Schedule 24 a) Farm Practices	A 3 m vegetation strip should only apply to the drains described in Table 13 e)	Support in part	There needs to be clarity for the need for the 3m vegetation strip on all drains.	A 3 m vegetation strip should only apply to the drains described in Table 13 e)
Balance Agri-Nutrients Ltd	56702 V2 pLWRP-177	Schedule 24 a) Farm Practices b) Nutrient management	Amend Schedule 24a) i) as set out in submission	Oppose in Part, support in part	The submitter seeks a range of changes relating to preparation of nutrient budgets required by Schedule 24 a) This clause relates to the review of nutrient budgets by the Council. At present this is on request and Horticulture New Zealand supports this. In order to determine how a property is tracking and if the property in increasing or decreasing nitrogen and phosphorus leaching an annual budget will need to be undertaken whether or not it is requested by Council	Alter wording to 'updated' rather than reviewed to avoid confusion with Council review. 'or and equivalent model approved by the Chief Executive of Canterbury Regional Council and is updated reviewed annually.

Appendix A

Simplified allocation framework – nitrogen discharges

