

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-73
Response Date	21/05/15 2:09 PM
Consultation Point	7 Mandatory Information (View)
Status	Submitted
Submission Type	Web
Version	0.2
To Be Heard	
Please select the appropriate option from the following:	I DO NOT wish to be heard in support of my submission; or
If so	

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-2
Response Date	21/05/15 2:09 PM
Consultation Point	15.6.3 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Table 18 - title has been amended (to not include South Canterbury Coastal), indicating that the Whitneys Creek Groundwater allocation zone (WGAZ) is entirely within the Waitaki area. This is not consistent with the plan maps which show WAGZ extending over the Waitaki and SCC areas. This creates confusion later in the plan.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Reinstate original title for table 18

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-3
Response Date	21/05/15 2:12 PM
Consultation Point	15.6.2 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Table 18 - Title has been amended (to not include South Canterbury Coastal), indicating that the Whitneys Creek Groundwater allocation zone (WGAZ) is entirely within the Waitaki area. This is not consistent with the plan maps which show WGAZ extending over the Waitaki and SCC areas. This creates confusion later in the plan.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Reinstate the original title for Table 18.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-4
Response Date	21/05/15 2:17 PM
Consultation Point	15 A South Coastal Canterbury Sub-regional Area (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	
	Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

The statement made on page 15-2 "...in catchment water use is at or beyond sustainable limits for both surface and groundwater..." is incorrect unless WAGZ does not extend in to this sub-sectional area. This statement can be interpreted as stating that WAGZ is over allocated, which is not the case.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Need to rephrase to state that WAGZ is not over allocated.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-5
Response Date	21/05/15 2:22 PM
Consultation Point	15.4.4 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Requires " *all farming activities to operate at good management practice or better.*" The MGM project will detail what is good management practice and what nitrogen leaching losses can be expected. It is unreasonable to expect all farming to operate at better than GMP.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Remove any requirement or expectation to operate at better than GMP. This does not however mean that farmers will not continue to do so.

Choose one of the following three

Tick relevant topics

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Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-6
Response Date	21/05/15 2:27 PM
Consultation Point	15.4.14 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

The ODL wastewater disposal area (covered by a current consent) is within the MGI irrigation company (MGI) command area. This rule may require MGI to manage nitrogen loss from farms receiving factory wastewater within the command area.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Need to include an exemption for nitrogen losses from any activity that is subject to the conditions of a current consent.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-7
Response Date	21/05/15 2:32 PM
Consultation Point	15.4.21 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

As written this rule appears to assume that all groundwater takes are for land irrigation and it could be interpreted as applying to the WGAZ. If so this could create confusion for the consented ODL factory groundwater take.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Redraft this rule so that it is clear that it does not apply to WGAZ.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-8
Response Date	21/05/15 2:35 PM
Consultation Point	15.4.24 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

This rule assumes that all takes are from ground and surface water resources listed in tables 15(f) - 15(l).

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Redraft this rule so that it is clear that it does not apply to WGAZ.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-9
Response Date	21/05/15 2:40 PM
Consultation Point	15.4.35 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

This will effectively limit the duration of any consent to take and use groundwater to a maximum of 17 years, reducing over time to 10 years. This could create problems over certainty of water supply to current and future processing plants.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Make an exemption of industrial takes to ensure certainty of supply.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-10
Response Date	21/05/15 2:44 PM
Consultation Point	15.5.2 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1

Support Oppose

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Schedule 24b is not the MGM

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Require farming to operate at good management practice as defined in the most recent version of the MGM and achieve the nitrogen losses for the farming type, soil type and climate shown in that MGM.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
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Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-11
Response Date	21/05/15 2:57 PM
Consultation Point	15.5.17 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Oceania Dairy has a consented industrial discharge in the Morven Sinclair catchment, As no industrial allocation has been made for ODL in the table 15(o), the discharge of factory wastewater to land will be a non complying activity unless the best practical option is used for discharge.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Request an industrial allocation for ODL of 40t N/yr on top of the farming allocation.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
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Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-12
Response Date	21/05/15 2:58 PM
Consultation Point	15.5.30 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

In the absence of specific reference to the WGAZ, consenting an increase groundwater take will be more onerous.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Re-draft this rule to include an additional clause for takes from the WGAZ.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-13
Response Date	21/05/15 3:04 PM
Consultation Point	15.7.3 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: . Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

This table purports to set limits for contaminants in groundwater and then lists targets (which are not limits). the limit for E. coli - median concentration (or any sample) is confusing. It would be unreasonable to judge groundwater microbiological quality on the result for one sample!

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Re-draft terminology (target/limit) to remove the confusion and remove any reference to (any sample) for E. coli.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-14
Response Date	21/05/15 3:08 PM
Consultation Point	Table 15(o): Nitrogen load limits for urban and industrial discharges in the South Coastal Canterbury Area (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	
	Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

The is no industrial allocation for ODL wastewater. ODL currently has a consent for disposal of wastewater on land within the Morven-Sinclair area.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Include industrial allocation for Oceania Dairy Limited on the Morven-Sinclairs area, similar to the industrial allocation made milk processing plant within the Waihao-Wainono area (milk processing plant at Studholme - load limit of 40t/yr)

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-15
Response Date	21/05/15 3:13 PM
Consultation Point	Table 15(p): Nitrogen load limits for farming in the South Coastal Canterbury Area (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	
	Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

There is likely to be a systematic under-estimate of the catchment farming nitrogen load for Morven-Sinclair. There is no provision to review this figure when Overseer is updated.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

The nitrogen load limit be revised for Morven Sinclairs using "actual" rather than "GMP" modelled nitrogen losses to better reflect the current catchment nitrogen load.

Choose one of the following three

Tick relevant topics

Make Submission

Consultee	Mr Shane Lodge (64011)
Email Address	shane.lodge@oceaniadairy.co.nz
Company / Organisation	Oceania Dairy Limited
Address	Oceania Dairy Limited PO Box 891 Timaru 7940
Event Name	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan
Submission by	Oceania Dairy Limited (Mr Shane Lodge)
Submission ID	V3pLWRP-16
Response Date	21/05/15 3:19 PM
Consultation Point	Schedule 24b- Farm Practices (View)
Status	Submitted
Submission Type	Web
Version	0.1
Support Oppose	

Supports in Part or Opposes in Part

State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Support Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Specific reference has been made to the 2013 data input standards. These data input standards are revised with each major revision of Overseer.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

Reference 'Current' or "most recent" Best Practice data input standards.

Choose one of the following three

Tick relevant topics