

From: [Patrick Lees](#)
To: [Mailroom Mailbox](#)
Cc: william.rolleston@southpacificsera.co.nz; [Mary Beech](#); [Bas Veendrick](#)
Subject: Further Submissions to Var3 of the Canterbury Land and Water Plan
Date: Friday, 17 July 2015 4:44:43 p.m.
Attachments: [Further Submission to ECan-Var 3 LWP- Blue Cliffs Station.pdf](#)

Please find attached a draft submission on Variation 3 of the Canterbury Land and Water Plan, on behalf of William Rolleston.

Kind regards,

Patrick

Patrick Lees - Freshwater Ecology | Environmental Scientist, Ecology

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Further Submission on Variation 3 to the Proposed Canterbury Land and Water Regional Plan – Waitaki

Form 6: Further Submissions in support of, or in opposition to,
submission on a Publicly Notified Proposed Policy Statement or
Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991

Return your signed further submission by 5.00pm Friday 17 July 2015 to:

Freepost 1201 Proposed Canterbury Air Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

FOR OFFICE USE ONLY

Submitter ID:

File No:

Full Name: William Rolleston Phone (Hm): 03 612 6688
Organisation*: Blue Cliffs Station Phone (Wk): 03 687 4050
* the organisation that this further submission is made on behalf of
Postal Address: PO Box 2117, Timaru Phone (Cell): 027 246 0634
Email: wr@southpacificsera.co.nz Postcode: 7941
Fax: 03 688 7608
Contact name and postal address for service of person making further submission (if different from above):

Only certain people can make further submissions. Please tick the option that applies to you:

- ☐ I am a person representing a relevant aspect of the public interest; or
☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
☐ I am the local authority for the relevant area.

- ☐ I do not wish to be heard in support of my further submission; or
☐ I do wish to be heard in support of my further submission; and if so,
☐ I would be prepared to consider presenting your further submission in a joint case with others making a similar submission at any hearing

Service of your further submission:

Please note: any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: [Signature] William Rolleston Date: 17/07/2015

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

(1) support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(4) Support or oppose
<i>Name & postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Note support or oppose</i>
South Canterbury Province, Federated Farmers of New Zealand Lionel Hume PO Box 414 Ashburton 7740	V3pLWRP-189	The ZIP Addendum envisaged a 'live document' this was agreed and sought through consultation	Support
Hunter Downs Development Company Limited Richard Timpany PO Box 418 Timaru 7940	V3 V3pLWRP-639	It is appropriate to enable the development of consented irrigation schemes and to encourage the augmentation of the Wainono Lagoon however the development of irrigation schemes should not be limited to those schemes listed.	Support in part
Nutrient Allocation Reference Group - Low Emitters Group Roger Small RD 9 Waimate 7979	V3 V3pLWRP-733	The plan unfairly restricts the ability of currently low nitrogen loss farms to farm	Support
DairyNZ Tami Woods c/o PO Box 85066 Lincoln University Lincoln 7647	V3 V3pLWRP-261	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities to be subject to a resource consent. This policy should reflect that.	Support in part
Ngāi Tahu and Nga Rūnanga Lynda Murchison PO Box 13046 Armagh Christchurch 8141	V3 V3pLWRP-131	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities to be subject to a resource consent. This policy should reflect that.	Support
DairyNZ Tami Woods c/o PO Box 85066 Lincoln University Lincoln 7647	V3 V3pLWRP-266	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities to be subject to a resource consent. This policy should reflect that.	Support

Fonterra Co-operative Group Limited Jo Appleyard and Ben Williams C/- Chapman Tripp PO Box 2510 Christchurch 8140	V3 V3pLWRP-985	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities to be subject to a resource consent. This policy should reflect that.	Support
South Canterbury Province, Federated Farmers of New Zealand Lionel Hume PO Box 414 Ashburton 7740	V3 V3pLWRP-197	Use of the word "avoid" has been interpreted by the courts as meaning the activity is "prohibited". The use of the "avoid" is an unreasonable test given scientific uncertainty and negligible but measurable adverse effects may be possible.	support
Hunter Downs Development Company Limited Richard Timpany PO Box 418 Timaru 7940	V3 V3pLWRP-1648	Use of the word "avoid" has been interpreted by the courts as meaning the activity is "prohibited". The use of the "avoid" is an unreasonable test given scientific uncertainty and negligible but measurable adverse effects may be possible.	Support
South Canterbury Province, Federated Farmers of New Zealand Lionel Hume PO Box 414 Ashburton 7740	V3pLWRP -199	Allowing future use of "un allocated" will help ensure farms can alter their practises in the future	Support
DairyNZ Tami Woods c/o PO Box 85066 Lincoln University Lincoln 7647	V3pLWRP -269	The Northern Streams Hill is in an Orange Nutrient Zone (see comment above for Policy 15.4.7) therefore the restriction as it relates to farming activities is not justified.	Support
Hunter Downs Development Company Ltd	<u>V3pLWRP-640</u>	Will restrict individual farmers developing unless they have dry shares in scheme. This is potentially and un-reasonable burden on new comers.	Support
Ravensdown Fertiliser Co-operative Ltd	<u>V3pLWRP-830</u>	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities above the max cap to be subject to a resource consent under strict conditions. This policy should reflect that.	Support in part Oppose in part
Fonterra Co-operative	<u>V3pLWRP-988</u>	The Northern Streams Hill is in an Orange Nutrient	Support

Group Limited Jo Appleyard and Ben Williams C/- Chapman Tripp PO Box 2510 Christchurch 8140		Zone (see comment above for Policy 15.4.7) therefore the restriction as it relates to farming activities is not justified.	
DairyNZ Tami Woods c/o PO Box 85066 Lincoln University Lincoln 7647	<u>V3pLWRP-271</u>	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities to be subject to a resource consent. This policy should reflect that.	Support
Fonterra Co-operative Group Limited Jo Appleyard and Ben Williams C/- Chapman Tripp PO Box 2510 Christchurch 8140	<u>V3pLWRP-990</u>	Consultation with the community and the resulting ZIP addendum allowed for increases in nutrient discharge from farming activities to be subject to a resource consent. This policy should reflect that.	Support
South Canterbury Province, Federated Farmers of New Zealand Lionel Hume PO Box 414 Ashburton 7740	<u>V3pLWRP-238</u>	Condition 3 means that even if the enterprise is operating below the flexibility cap there can be no Delete condition 3 of rule 15.5.6 change in activity which would increase the nitrogen loss calculation. It also places more severe restrictions on Farming Enterprises than individual farming operations. Within the Northern Streams Zone an increase in nitrogen loss calculation should be possible.	Support
Fertilizer association of New Zealand	<u>V3pLWRP-238</u>	Condition 3 means that even if the enterprise is operating below the flexibility cap there can be no change in activity which would increase the nitrogen loss calculation. It also places more severe restrictions on Farming Enterprises than individual farming operations. Within the Northern Streams Zone an increase in nitrogen loss calculation should be possible.	Support
Ngāi Tahu and Nga Rūnanga	<u>V3pLWRP-164</u>	The intent of these conditions is to ensure that the available B-block water is split evenly between existing A-block users and new users. This needs to be reworded. The discretion matters are supported in that they provide flexibility to allow the latest science to be applied to any take consent conditions while protecting the environment and the interests of other	oppose

<p>South Canterbury Province, Federated Farmers of New Zealand Lionel Hume PO Box 414 Ashburton 7740</p>	<p><u>V3pLWRP-260</u></p>	<p>water users.</p> <p>The intent of these conditions is to ensure that the available B-block water is split evenly between existing A-block users and new users. This needs to be reworded.</p> <p>This additional condition will ensure abstractions will occur as planned</p>	<p>oppose</p>
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