

**From:** [Lionel Hume](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** V3 pLWRP Further Submission  
**Date:** Friday, 17 July 2015 4:55:35 p.m.  
**Attachments:** [FNZ Further Submission LWRP Var 3 final.pdf](#)

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Dear Sir/Madam,

Attached is Federated Farmers' further submission on Proposed Variation 3 to the Proposed LWRP.

Yours sincerely,

**LIONEL HUME**  
SENIOR POLICY ADVISOR

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# Federated Farmers of New Zealand

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

17 July 2015



# **FURTHER SUBMISSION TO ENVIRONMENT CANTERBURY ON PROPOSED VARIATION 3 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN**

## Form 6

Further submission in support of, or in opposition to, submission on publicly notified  
proposed policy statement or plan

*Clause 8 of First Schedule, Resource Management Act 1991*

To: *Canterbury Regional Council  
PO Box 345  
Christchurch 8140*

Name of further submitter: South Canterbury Province, Federated Farmers of New Zealand

Contact person: Dr Lionel Hume  
Senior Policy Advisor

Address for service: PO Box 414, Ashburton 7740 or lhume@fedfarm.org.nz

This is a further submission in response to submission/s made on the following: Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan – Section 15 – Waitaki and South Coastal Canterbury.

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

Federated Farmers wishes to be heard in support of its further submission.

### **Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Central South Island Fish and Game Council	V3pLWRP-355	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan – Section 15 – Waitaki and South Coastal Canterbury	Oppose	The proposed plan has been through an extensive community consultation process, including the Zone Committee process, to identify community values and to ensure that environmental and other values are safeguarded. Therefore, Federated Farmers opposes this attempt to wind back the clock and re-start the limit-setting process.
Central South Island Fish and Game Council	V3pLWRP-356	Proposed Variation 3	Oppose	The proposed plan has been through an extensive community consultation process, including the Zone Committee process, to identify community values and to ensure that environmental and other values are safeguarded. Schedule 3 lists water quality standards, for a limited number of properties/characteristics, for water managed for different purposes. It is up to councils as to whether or not they use the Schedule 3 classes. It is not the purpose of Schedule 3 to overrule a community limit setting process. Therefore, Federated Farmers opposes this attempt to wind back the clock and re-start the limit-setting process.
Central South Island Fish and Game Council	V3pLWRP-357	Proposed Variation 3	Oppose	The proposed plan has been through an extensive community consultation process, including the Zone Committee process, to identify community values and to ensure that environmental and other values are safeguarded. Therefore, Federated Farmers opposes this attempt to wind back the clock and re-start the limit-setting process.
Central South Island Fish and Game Council	V3pLWRP-358	Proposed Variation 3	Oppose	The proposed plan has been through an extensive community consultation process, including the Zone Committee process, to identify community values and to ensure that environmental and other values are safeguarded. Schedule 3 lists water quality standards, for a limited number of properties/characteristics, for water managed for different purposes. It is up to councils as to whether or not they use the Schedule 3 classes. It is not the purpose of Schedule 3 to overrule a community limit setting process. Therefore, Federated Farmers opposes this attempt to wind back the clock and re-start the limit-setting process.
Central South Island Fish and Game Council	V3pLWRP-360	Proposed Variation 3	Oppose	The proposed plan has been through an extensive community consultation process, including the Zone Committee process, to identify

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
				community values and to ensure that environmental and other values are safeguarded. Therefore, Federated Farmers opposes this attempt to wind back the clock and re-start the limit-setting process.
John Gardner	818	Proposed Variation 3	Support	<p>Support the request to amend the Nutrient Allocation Zones by separating the Waihao-Wainono area into two areas – Waihao and Wainono. This would enable greater consideration to be given to the previous (LWRP) nutrient allocation status, particularly the areas zoned orange adjacent to the Waihao River.</p> <p>Provision should be made for the areas previously zoned Orange, such as Waihao and Northern Streams, to be able to increase their N loss to 20 kg/ha/year as a permitted activity, as provided for in the LWRP, and for those with N loss greater than 20 kg/ha/year to increase by 5 kg/ha/year, as also provided for in the LWRP.</p>
DairyNZ	281	A South Coastal Canterbury Sub-regional Area 15A	Support	Summarises the importance of agriculture to South Coastal Canterbury and the wider regions.
Horticulture NZ	286	South Coastal Canterbury Definitions 15.1	Support	In order to be effective, flexibility caps need to be adjusted to the current version of Overseer – consistent with our submission.
Horticulture NZ	288	South Coastal Canterbury Definitions 15.1	Support	In order to be effective, maximum caps need to be adjusted to the current version of Overseer – consistent with our submission.
Central South Island Fish & Game	367	15.4.1	Oppose	Unworkable, especially the blanket inclusion of drains and ephemeral waterways.
DairyNZ	235	15.4.2	Support in part	Support as an acceptable alternative to our own decisions sought for Policies 15.4.1 and 15.4.2, with the addition of a sentence stating that: <i>The load limits in Tables 15(o) and 15(p) will be reviewed when the MGM project is complete and when new versions of Overseer are issued</i> , consistent with our submission on Policy 15.4.2.
Department of Conservation	440	South Coastal Canterbury Definitions	Oppose	There is no reason why any or all of the additional listed organisations would need to be involved.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
		15.1		
Horticulture NZ	291	Freshwater Outcomes 15.3	Support	Tables 15(a) and 15(b) contain outcomes, not objectives.
Dairy Holdings Ltd	405	Policies 15.4	Support	There needs to be a policy covering disestablishment of Farming Enterprises.
Central South Island Fish & Game	372	15.4.15	Oppose in part	Federated Farmers supports the N allocation framework adopted by the Nitrogen Allocation Reference Group (NARG), amended as requested in the original submissions of both Federated Farmers and the NARG.
Horticulture NZ	305	15.4.16	Support	Support, in addition to our requested decision because it enables a greater diversity solutions.
Department of Conservation	476	15.4.17	Support	Weed control is a crucial part of catchment restoration activities.
Horticulture NZ	308	15.4.20	Support	The reasonable use methodology is a preferable to demonstrated use because it is more directly related to potential plant demand and is more transparent. However, we accept that both methodologies are offered in Schedule 10.
Horticulture NZ	309	15.4.21	Support	The reasonable use methodology is a preferable to demonstrated use because it is more directly related to potential plant demand and is more transparent. However, we accept that both methodologies are offered in Schedule 10.
Horticulture NZ	310	15.4.22	Support	The reasonable use methodology is a preferable to demonstrated use because it is more directly related to potential plant demand and is more transparent. However, we accept that both methodologies are offered in Schedule 10.
Horticulture NZ	311	15.4.23	Support	The reasonable use methodology is a preferable to demonstrated use because it is more directly related to potential plant demand and is more transparent. However, we accept that both methodologies are offered in Schedule 10.
Central South Island Fish & Game	373	15.4.23	Oppose	Not necessary. Other plan provisions will ensure that surface water will not be re-allocated when/where there is over allocation.
Hunter Downs Development Company Ltd	641	15.5	Oppose in part.	Federated Farmers is strongly opposed to the suggestion that those who access the flexibility caps in Table 15(l) (p 3 of Hunter Downs' submission) should share the cost of augmentation of Wainono Lagoon, because the need to augment is largely because of intensive farming activity. Any cost sharing approach should be developed following

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
				discussion with the whole community.
South Canterbury Province, Federated Farmers of New Zealand		15.5.1 – 15.5.14		Federated Farmers' submission on these rules has not been included in the Summary of Decisions Requested Report.
Central South Island Fish & Game	378	15.5.2	Oppose in part	Unnecessarily wordy.
David Linton	418	15.5.2	Support	<p>Support the need to provide for low-level development (some of which may have already occurred or may be in progress) of existing dryland and partly irrigated properties, including provision for the realisation of existing consents. For areas previously classified as orange or green the provision should reflect that classification. For example, in Orange Zones allow up to 20 kg N/ha/year N loss as a permitted activity.</p> <p>Many low N loss farmers are never likely to irrigate and have very limited ability to increase their N loss rate. They should be a permitted activity and have no requirement to adhere to a baseline. They could be subject to a narrative limit (e.g. no more than 40 ha of winter grazing) similar to the approach proposed in Variation 5 of the LWRP.</p>
Ravensdown Fertiliser Co-operative Ltd	860	15.5.4	Support	Discretionary is an appropriate activity status, because all relevant matters can be considered.
David Linton	419	15.5.2	Support	Support the need to provide for low-level development (some of which may have already occurred or may be in progress) of existing dryland and partly irrigated properties, including provision for the realisation of existing consents. For areas previously classified as orange or green the provision should reflect that classification. For example, in Orange Zones allow up to 20 kg N/ha/year N loss as a permitted activity.
Ravensdown Fertiliser Co-operative Ltd	864	15.5.6	Support	For the reasons given by the original submitter.
Ravensdown Fertiliser Co-operative Ltd	860	15.5.7	Support	Discretionary is an appropriate activity status, because all relevant matters can be considered.
Ravensdown Fertiliser Co-operative Ltd	875	15.5.10	Support	Prohibited activity status is inappropriate given the nature of the conditions in Rule 15.5.9, S-map updates and modelling errors.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Fertiliser Association of NZ	952	15.5.11	Support	Restricted discretionary activity is appropriate – matters for discretion should be able to be readily defined for this rule.
Central South Island Fish & Game	359	15.5.19	Oppose	The decision requested would make the rule unworkable.
DairyNZ	289	15.5.26	Support	Support for the reasons given by the original submitter,
Central South Island Fish & Game	380	Table 15(a)	Oppose	The requested decision is not necessary to achieve the purpose of the table.
Otaio Water User Group	483	Table 15(a)	Support	For the reasons given by the original submitter.
Central South Island Fish & Game	364	Table 15(b)	Oppose	The requested decision is excessive in the context of the catchment and efforts planned to improve water quality.
Central South Island Fish & Game	382	Table 15(c)	Oppose	The requested decision is excessive in the context of the catchment and efforts planned to improve water quality.
Otaio Water User Group	594	Table 15(c)	Support	For the reasons given by the original submitter.
Hunter Downs Development Company Ltd	669	Table 15(c)	Support	For the reasons given by the original submitter.
Central South Island Fish & Game	362	Table 15(d)	Oppose	The table contains target values for various environmental indicators. It is the role of the planning/community consultation process to determine how those numbers will be used, including timeframes.
Hunter Downs Development Company Ltd	670	Table 15(d)	Support	For the reasons given by the original submitter. The annual median is the appropriate statistic to use for the TLI target and the other, individual parameters are not necessary.
Oceania Dairy Ltd	13	Table 15(e)	Support	For the reasons given by the original submitter. Median (concentration) is the appropriate statistic for the purpose of the table. "Any sample" is not, because it could reflect one-off situations, including sample contamination.

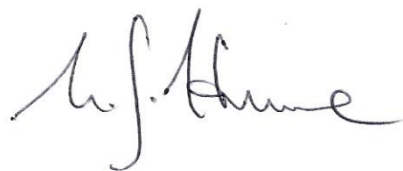


Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Central South Island Fish & Game	363	Table 15(e)	Oppose	The table contains target values for various environmental indicators. It is the role of the planning/community consultation process to determine how those numbers will be used, including timeframes.
Community Public Health	983	Table 15(e)	Oppose	Covered by the maximum concentration set at <11.3 mg/L. It is up to the regulator to determine how to achieve that.
Otaio Water User Group	596	Table 15(f)	Support	For the reasons given by the original submitter.
Department of Conservation	565	Table15(g)	Support	The flow and allocation regimes in Table 15(g) have been through a thorough community value-setting and consultation process.
Central South Island Fish & Game	383	Table 15(g)	Oppose	The flow and allocation regimes in Table 15(g) have been through a thorough community value-setting and consultation process.
Ngai Tahu and Nga Runanga	111	Table 15(g)	Oppose	The flow and allocation regimes in Table 15(g) have been through a thorough community value-setting and consultation process.
Otaio Water User Group	597	Table15(h)	Support	The flow and allocation limits in Table 15(h) have been through a thorough community value-setting and consultation process.
Central South Island Fish & Game	384	Table 15(h)	Oppose	The flow and allocation limits in Table 15(h) have been through a thorough community value-setting and consultation process.
Ngai Tahu and Nga Runanga	112	Table 15(h)	Oppose	The flow and allocation limits in Table 15(h) have been through a thorough community value-setting and consultation process.
Otaio Water User Group	599	Table15(k)	Support	For the reasons given by the original submitter.
Ngai Tahu and Nga Runanga	168	Table 15(m)	Support in part	Support the concept of a nitrogen flexibility cap based on soil type.
David Linton	420	Table 15(m)	Support	Support the need to provide for low-level development (some of which may have already occurred or may be in progress) of existing dryland and partly irrigated properties, including provision for the realisation of existing consents. For areas previously classified as orange or green the provision should reflect that classification. For example, in Orange Zones allow up to 20 kg N/ha/year N loss as a permitted activity.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Otaio Water User Group	606	High Naturalness Water Bodies 15.9	Support	For the reasons given by the original submitter.
Ngai Tahu and Nga Runanga	170	Amendments to Section 16 - Schedules	Oppose in part	Cultural, ecological or other descriptions or assessments should be confined to identified areas of specific concern, to avoid the need for comprehensive, wide-ranging and costly descriptions/assessments being required routinely (which may require the use of consultants). Such assessments would be particularly onerous for extensive properties.

## Conclusion

Federated Farmers thanks Environment Canterbury for the opportunity to further-submit on Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan. We look forward to ongoing dialogue about the plan and continuing to work constructively with Council.



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Mark Adams  
 President  
 South Canterbury Province  
 Federated Farmers of New Zealand