

**From:** [Eve Williams](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** RE: Submission on Var 3  
**Date:** Monday, 20 July 2015 4:05:39 p.m.  
**Attachments:** [Further Submission on Proposed Variation 3 Canterbury Land and Water Regional Plan \(00000002\)-signed.pdf](#)

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Good afternoon,

As requested, please find attached a signed further submission on behalf of Horticulture New Zealand on Variation 3 to the Proposed Canterbury Land and Water Regional Plan. Apologies for the first version which didn't have a signature.

If you have any queries please feel free to contact Angela Halliday on 027 947 33 44.

Many thanks

Eve

**Eve Williams** | Executive Assistant to Chris Keenan & Angela Halliday | Horticulture New Zealand

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**From:** Lynette Wharfe  
**Sent:** Friday, July 17, 2015 4:46 PM  
**To:** [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)  
**Subject:** Submission on Var 3

Please find attached a further submission on behalf of Horticulture NZ on Variation 3 to the Proposed Canterbury Land and Water Regional Plan

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**Further Submission on Proposed Variation 3 Canterbury Land and Water Regional Plan**

(Closing date: Friday 17 July 2015)

To: Environment Canterbury  
PO Box 345  
Christchurch 8140

Email: [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

Full Name of Further Submitter:  
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Horticulture New Zealand represents horticultural growers in the Canterbury Region, so represents a relevant aspect of the public interest.

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

**I do** wish to be heard in support of my submission

If others make a similar submission, I **would not** be prepared to consider preparing a joint case with them at any hearing.



**Signature of person making submission or person authorised to sign on behalf of person making submission.**

**Date:** 17 July 2015

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Federated Farmers of NZ	64848	V3pLWRP-173	Whole Var	Replace maximum cap numbers in Var 3 with relevant GMP benchmark N loss numbers form MGM	Support in part	The use of best management practices is supported
Federated Farmers of NZ	64848	V3pLWRP-174	Whole Var	Amend Var 3 to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of Overseer	Support	There needs to be provision for version control of Overseer.
Federated Farmers of NZ	64848	V3pLWRP-175	Whole Var	Amend Var 3 to correct modelling errors, to accommodate S-map updates and align modelled estimates with on farm estimates of N loss.	Support	The variation should be based on robust and accurate modelling and data.
Federated Farmers of NZ	64848	V3pLWRP-177	Whole Var	Hold pre-hearing meetings to facilitate resolution of matters raised in submissions	Support	Pre-hearing meetings are an appropriate way to try and resolve matters prior to a hearing.
Central SI Fish and Game	53274	V3pLWRP-356	Whole Var	Waterbody values should be identified in accordance with water quality classes	Oppose	Values should be based on the National Objectives Framework.
Central SI Fish and Game	53274	V3pLWRP-357	Whole Var	Seeks new table with waterbody values for specified list	Oppose	Values should be based on the National Objectives Framework.
Central SI Fish and Game	53274	V3pLWRP-358	Whole Var	Seeks contact recreation sites for regional salmonid fisheries	Oppose	Contact recreational standards are designed to protect people. Standards for salmonid fisheries should be based ecosystems requirements as set out by the zone committed.
Butlers Fruit farm Ltd	64082	V3pLWRP-391	Whole Var	Include a method for determining nitrogen loads for orchards	Support	Overseer does not include all horticultural crops
Dairy Holdings Ltd	53683	V3pLWRP-402	Whole Var	Delete reference to nutrient user groups	Oppose	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so is supported.
Dairy Holdings Ltd	53683	V3pLWRP-415	Whole Var	Provide for updating of Overseer	Support	There needs to be provision for version control of Overseer.
Nutrient Allocation	64087	V3pLWRP-608	Whole Var	Seeks a modified equal allocation approach	Support in part	There is need to ensure that low emitters are not unfairly penalised through the allocation regime.

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Reference Group Low Emitters Group						
Nutrient Allocation Reference Group Low Emitters Group	64087	V3pLWRP-728	Whole Var	Seeks a provision for flexibility for low emitters	Support in part	There is need to ensure that low emitters are not unfairly penalised through the allocation regime.
Nutrient Allocation Reference Group Low Emitters Group	64087	V3pLWRP-732	Whole Var	Seeks longer timeframes for calculation of nitrogen baselines for low emitters	Support in part	There is need to ensure that low emitters are not unfairly penalised through the allocation regime.
Ravensdown Fertiliser Co- operative Ltd	56708	V3pLWRP-753	Whole Var	Seeks change in activity status and deletion of maximum cap mechanism	Support in part	The change in activity status sought is more effects based.
Beef and Lamb NZ Ltd	64125	V3pLWRP-786	Whole Var	Provide for updating of Overseer	Support in part	There needs to be provision for version control of Overseer.
Beef and Lamb NZ Ltd	64125	V3pLWRP-791	Whole Var	Amend the soils data and recalculate nitrogen load and allocation based on correct soil data	Support	The variation should be based on robust and accurate modelling and data.
Beef and Lamb NZ Ltd	64125	V3pLWRP-792	Whole Var	Seeks greater flexibility for low nitrogen loss activities	Support in part	There is need to ensure that low emitters are not unfairly penalised through the allocation regime.
Nitrogen Allocation Reference Group	51457	V3pLWRP-852	Whole Var	Replace maximum cap numbers in Var 3 with relevant GMP benchmark N loss numbers form MGM	Support in part	The use of best management practices is supported
Nitrogen Allocation Reference Group	51457	V3pLWRP-853	Whole Var	Amend Var 3 to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of Overseer	Support	There needs to be provision for version control of Overseer.
Nitrogen	51457	V3pLWRP-854	Whole Var	Amend Var 3 to correct modelling errors,	Support	The variation should be based on robust and accurate

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Allocation Reference Group				to accommodate S-map updates and align modelled estimates with on farm estimates of N loss.		modelling and data.
Nitrogen Allocation Reference Group	51457	V3pLWRP-856	Whole Var	Hold pre-hearing meetings to facilitate resolution of matters raised in submissions	Support	Pre-hearing meetings are an appropriate way to try and resolve matters prior to a hearing.
Lower Waitaki River Management Soc Inc	64116	V3pLWRP-1014	15A	Intends to provide specific alternatives to the Variation at the hearing and raises concerns about insufficient controls to meet national and regional freshwater objectives	Oppose	It is not appropriate that new alternatives are presented at the hearing with no opportunity for other submitters to comment.
Lower Waitaki River Management Soc Inc	64116	V3pLWRP-960	15A	Amend some targets to limits or standards	Oppose	It is unclear which targets the submitter wants changed.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-117	Definitions 15.1	Insert a new definition of change of land use	Support in part	The definition sought is effects based
Dairy Holdings Ltd	53683	V3pLWRP-400	Definitions 15.1	Delete definition of nutrient user groups	Oppose	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so is supported.
Blue Cliff Station	53856	V3pLWRP-427	Definitions 15.1	Insert a new definition for farming enterprise	Oppose	A farming enterprise should not be limited to contiguous properties
Ballance Agri-nutrients Ltd	63247	V3pLWRP-635	Definitions 15.1	Amend the definition of flexibility cap to better explain the mechanism	Support in part	A definition needs to be clear as to what is included or intended
Fertiliser Assoc of NZ	56725	V3pLWRP-700	Definitions 15.1	Amend definition of new farming activity to include rotational land use	Support	There should be recognition of rotational land use as part of a farming activity.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-769	Definitions 15.1	Amend definition of existing farming activity to include rotational land use	Support	There should be recognition of rotational land use as part of a farming activity.

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-770	Definitions 15.1	Amend definition of new farming activity to include exclusion for farming enterprise, nutrient user groups and irrigation schemes	Support	The exclusion is appropriate
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-771	Definitions 15.1	Amend definition of flexibility cap to include how the cap may be modelled	Support in part	There needs to be clarity as to how a flexibility cap is established
Ngai Tahu and Nga Runanga	64073	V3pLWRP-125	Policies 15.4	Include policies for cultural landscapes	Oppose in part	The inclusion of cultural landscapes and requirements on landowners in those areas needs to be assessed in the s32 Report to ensure that it is the most efficient and appropriate method to be used.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-139	Policies 15.4	Undertake a comprehensive review of surface and groundwater allocation and phase out overallocation by 1 July 2018	Oppose in part	A plan change would be required to implement the policy.
Federated Farmers of NZ	64848	V3pLWRP-189	Policies 15.4	Insert new policy to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of Overseer	Support	There needs to be provision for version control of Overseer.
Nutrient Allocation Reference Group Low Emitters Group	64087	V3pLWRP-733	Policies 15.4	Amend policies 15.4.1 – 15.4.17 to provide for flexibility for low emitters	Support in part	There is need to ensure that low emitters are not unfairly penalised through the allocation regime.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-127	Policy 15.4.1	Delete Policies 15.4.1 and 15.4.4 and replace with a new policy based on GMP's	Support in part	The Horticulture NZ submission supports the use of GMP's
Central SI Fish and Game	53274	V3pLWRP-367	Policy 15.4.1	Replace policy 15.4.1	Oppose	The policy sought is wordy. Clarity is important in a policy.
Federated Farmers of NZ	64848	V3pLWRP-183	Policy 15.4.2	Amend Policy 15.4.2 and link to MGM and new versions of Overseer	Support	There needs to be provision for version control of Overseer and recognition of MGM

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ngai Tahu and Nga Runanga	64073	V3pLWRP-128	Policy 15.4.4	Delete Policies 15.4.1 and 15.4.4 and replace with a new policy based on GMP's	Support in part	The Horticulture NZ submission supports the use of GMP's
Central SI Fish and Game	53274	V3pLWRP-368	Policy 15.4.4	Amend Policy 15.4.4	Oppose	The policy sought does not provide for good management practices.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-129	Policy 15.4.5	Delete Policies 15.4.5, 15.4.6 and 15.4.7 and replace with a new policy which provides for change of land use	Support in part	Inclusion of policy provisions for flexibility of land use changes is supported
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-777	Policy 15.4.5	Amend Policy 15.4.5 to include GMP's	Support	Horticulture NZ submission supports the use of GMP's
Ngai Tahu and Nga Runanga	64073	V3pLWRP-130	Policy 15.4.6	Delete Policies 15.4.5, 15.4.6 and 15.4.7 and replace with a new policy which provides for change of land use	Support in part	Inclusion of policy provisions for flexibility of land use changes is supported
Dairy NZ	63179	V3pLWRP-265	Policy 15.4.6	Amend Policy 15.4.6	Oppose in part	Deletion of existing is not supported and there needs to be adequate provision for rotational systems.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-783	Policy 15.4.6	Amend Policy 15.4.6 to include GMP's	Support	Horticulture NZ submission supports the use of GMP's
Ngai Tahu and Nga Runanga	64073	V3pLWRP-131	Policy 15.4.7	Delete Policies 15.4.5, 15.4.6 and 15.4.7 and replace with a new policy which provides for change of land use	Support in part	Inclusion of policy provisions for flexibility of land use changes is supported
Dairy NZ	63179	V3pLWRP-266	Policy 15.4.7	Delete Policy 15.4.7 and replace with new policy that provides where nitrogen loss rates cannot be met by 1 January 2030	Oppose in part	Deletion of the policy is not supported as the replacement policy sought provides lack of consideration of impact on total catchment load.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-785	Policy 15.4.7	Amend Policy 15.4.7 to include GMP's	Support	Horticulture NZ submission supports the use of GMP's
Fonterra Co-	64090	V3pLWRP-985	Policy 15.4.7	Delete Policy 15.4.7 and replace with	Oppose	Deletion of the policy is not supported as the replacement

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
operative Group Ltd				new policy that provides where nitrogen loss rates cannot be met by 1 January 2030	in part	policy sought provides lack of consideration of impact on total catchment load.
Dairy Holdings Ltd	53683	V3pLWRP-1012	Policy 15.4.10	Amend Policy 15.4.10 to delete reference to nutrient user groups	Oppose	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so is supported.
Dairy Holdings Ltd	53683	V3pLWRP-1013	Policy 15.4.11	Amend Policy 15.4.11 to delete reference to nutrient user groups	Oppose	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so is supported.
Dairy Holdings Ltd	53683	V3pLWRP-403	Policy 15.4.12	Amend Policy 15.4.12 to delete reference to nutrient user groups but add farming enterprises	Oppose in part support in part	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so should be retained. The addition of farming enterprises is appropriate.
Fertiliser Assoc of NZ	56725	V3pLWRP-711	Policy 15.4.12	Amend policy to replace 'movement' with 'transfer'	Support	Transfer is a more appropriate term.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-708	Policy 15.4.12	Delete Policy 15.4.12	Oppose	There needs to be the ability to transfer nitrogen in a farming enterprise or nutrient user group
Dairy Holdings Ltd	53683	V3pLWRP-404	Policy 15.4.13	Amend Policy 15.4.13 to delete reference to nutrient user groups but add farming enterprises	Oppose in part support in part	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so should be retained. The addition of farming enterprises is appropriate.
Central SI Fish and Game	53274	V3pLWRP-372	Policy 15.4.15	Amend Policy 15.4.15 by adding 'by 2035'	Oppose	The water quality in Wainono Lagoon is an intergenerational issue and will require a long period to improve.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-140	Policy 15.4.21	Delete Policy 15.4.21b) and replace with 'no increase in rate or take or annual volume'	Support in part	Currently the policy is based on no increase in area of irrigation. The change sought is more effects based.
Central SI Fish and Game	53274	V3pLWRP-373	Policy 15.4.23	Amend Policy 15.4.23 by adding additional words	Oppose	Consideration of overallocation is provided in Policy 15.4.19



Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group Ltd	64090	V3pLWRP-1003	Policy 15.4.24	Amend Policy 15.4.24 to provide water for industrial or trade processes and amend c) to provide for efficient use of water	Oppose in part Support in part	Consideration of efficient use of water is supported. There should not be different considerations for industrial or trade processes.
Fonterra Co-operative Group Ltd	64090	V3pLWRP-1002	Policy 15.4.23	Amend Policy 15.4.23 to provide water for industrial or trade processes and amend c) to provide for efficient use of water	Oppose in part Support in part	Consideration of efficient use of water is supported. There should not be different considerations for industrial or trade processes.
Central SI Fish and Game	53274	V3pLWRP-375	Policy 15.4.29	Amend Policy 15.4.29 to include numerical groundwater block	Oppose	The policy is not the appropriate location for the numerical groundwater block
Ngai Tahu and Nga Runanga	64073	V3pLWRP-144	Policy 15.4.30	Replace Policy 15.4.30 to provide for transfers of water	Support	Transfer of water is an appropriate mechanism to include in the Plan.
Fonterra Co-operative Group Ltd	64090	V3pLWRP-986	Policy 15.4.30	Amend Policy 15.4.30 to provide water transfers for industrial or trade processes and amend c) to provide for efficient use of water	Oppose in part	There should not be different considerations for industrial or trade processes.
Dairy NZ	63179	V3pLWRP-268	Policy 15.4.35	Delete Policy 15.4.35 or amend as sought in the submission to apply common expiry dates only to irrigation takes	Oppose	If common expiry dates are included they should apply to all water takes and not provide preferential treatment to some water users.
Fonterra Co-operative Group Ltd	64090	V3pLWRP-987	Policy 15.4.35	Delete Policy 15.4.35 or amend as sought in the submission to provide for 35 year consents for large capital intensive activities.	Oppose	If common expiry dates are included they should apply to all water takes and not provide preferential treatment to some water users.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-692	Policy 15.4.35	Amend Policy 15.4.35 to include review conditions rather than common expiry dates	Support in part	Horticulture NZ does not support common expiry dates but a policy to include a review conditions may be appropriate.
Dairy Holdings Ltd	53683	V3pLWRP-413	Rules 15.5	Insert new Rule 15.5.9A to provide for farming enterprises	Support in part	Providing a non complying rule for farming enterprises based on criteria in 15.5.9 is supported but farming enterprises

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
						would need to be included in Rule 15.5.9.
Dept of Conservation	64095	V3pLWRP-544	Rules 15.5	Include new rule to limit use of land within 3 metres of banks of river stream creek or drain in listed schedule of sites of know Canterbury mudfish habitats	Oppose	There should be the ability to carry out some activities without need for resource consent.
Hunter Downs Development Company Ltd	55552	V3pLWRP-644	Rules 15.5	Include new rule re versions of Overseer	Support in part	There needs to be provision for version control of Overseer
Nutrient Allocation Reference Group Low Emitters Group	64087	V3pLWRP-737	Rule 15.5	Amend rules 15.5.2- 15.5.5 to provide for flexibility for low emitters	Support in part	There is need to ensure that low emitters are not unfairly penalised through the allocation regime.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-147	Rule 15.5.1	Add new condition to 15.5.1	Oppose	Table 15(m) should not apply to properties less than 5 hectares
Federated Farmers of NZ	64848	V3pLWRP-233	Rule 15.5.2	Amend Rule 15.5.2 and link to MGM	Support	There needs to be provision for recognition of MGM
Dairy NZ	63179	V3pLWRP-269	Rule 15.5.2	Delete Rule 15.5.2 and replace with 4 new rules	Oppose	Horticulture NZ sought that Rule 15.5.2 be retained.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-830	Rule 15.5.2	Amend Rule 15.5.2	Support in part	There needs to be provision for recognition of MGM
Fonterra Co-operative Group Ltd	64090	V3pLWRP-988	Rule 15.5.2	Delete Rule 15.5.2 and replace with 4 new rules	Oppose	Horticulture NZ sought that Rule 15.5.2 be retained.
Dairy NZ	63179	V3pLWRP-271	Rule 15.5.3	Amend Rule 15.5.3	Oppose	Horticulture NZ sought that Rule 15.5.3 be retained.
Federated Farmers of NZ	64848	V3pLWRP-234	Rule 15.5.3	Amend Rule 15.5.3	Support	Recognition of problems with the soil maps is appropriate and conditions in rules need to reflect this
Ravensdown Fertiliser Co-	56708	V3pLWRP-840	Rule 15.5.3	Amend Rule 15.5.3	Support in part	There needs to be provision for recognition of MGM

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
operative Ltd						
Fonterra Co-operative Group Ltd	64090	V3pLWRP-990	Rule 15.5.3	Amend Rule 15.5.3	Oppose	Horticulture NZ sought that Rule 15.5.2 be retained.
Dairy NZ	63179	V3pLWRP-287	Rule 15.5.5	Amend Rule 15.5.5	Oppose	Horticulture NZ sought that Rule 15.5.5 be non complying
Fonterra Co-operative Group Ltd	64090	V3pLWRP-991	Rule 15.5.5	Amend Rule 15.5.5	Oppose	Horticulture NZ sought that Rule 15.5.5 be non complying
Dairy Holdings Ltd	53683	V3pLWRP-409	Rule 15.5.6	Delete Rule 15.5.6	Oppose	There needs to be provision for farming enterprises. Horticulture NZ has sought amendments to the rule.
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-864	Rule 15.5.6	Amend Rule 15.5.6	Support	Horticulture NZ has sought amendments to the rule including to be restricted discretionary activity
Fertiliser Assoc of NZ	56725	V3pLWRP-947	Rule 15.5.6	Amend Rule 15.5.6 (3)	Oppose	Horticulture NZ has sought that condition 3 be deleted
Fertiliser Assoc of NZ	56725	V3pLWRP-948	Rule 15.5.7	Amend Rule 15.5.7	Support in part	Horticulture NZ has sought amendments to the rule including activity status
Federated Farmers of NZ	64848	V3pLWRP-241	Rule 15.5.8	Amend Rule 15.5.8 to non-complying	Support	Horticulture NZ has sought amendments to the rule activity status
Dairy Holdings Ltd	53683	V3pLWRP-411	Rule 15.5.8	Delete Rule 15.5.8	Oppose	There needs to be provision for farming enterprises. Horticulture NZ has sought amendments to the rule.
Dairy Holdings Ltd	53683	V3pLWRP-412	Rule 15.5.9	Amend Rule 15.5.9 to delete nutrient user groups and replace with farming enterprises	Oppose	Nutrient user groups provide a mechanism for managing nitrogen between a group of users, which provides a degree of flexibility so should be retained. The conditions are not all relevant to farming enterprises
Ngai Tahu and Nga Runanga	64073	V3pLWRP-152	Rule 15.5.10	Amend Rule 15.5.10 to non-complying where conditions other than 1 f) are met	Support	The change in activity status is supported
Dairy Holdings Ltd	53683	V3pLWRP-414	Rule 15.5.10	Amend Rule 15.5.10 to delete nutrient user groups and replace with farming enterprises	Oppose	Horticulture NZ does not support the changes to Rule 15.5.9 on which Rule 15.5.10 is based.

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ngai Tahu and Nga Runanga	64073	V3pLWRP-159	Rule 15.5.26	Amend Rule 15.5.26 to non-complying where waterbody not provided for in Table 15 f) to i) are met	Support	The change in activity status is supported
Federated Farmers of NZ	64848	V3pLWRP-250	Rule 15.5.30	Amend Rule 15.5.30 by deleting conditions 2ii) and 4ii)	Support in part	Currently condition 2ii) is based on no increase in area of irrigation. A change to volume of take would be more effects based.
Federated Farmers of NZ	64848	V3pLWRP-253	Rule 15.5.31	Amend Rule 15.5.31 to non-complying	Support	The change in activity status is supported
Federated Farmers of NZ	64848	V3pLWRP-256	Rule 15.5.33	Amend Rule 15.5.33 to non-complying	Support	The change in activity status is supported
Federated Farmers of NZ	64848	V3pLWRP-259	Rule 15.5.36	Amend Rule 15.5.36 to non-complying	Support	The change in activity status is supported
Ngai Tahu and Nga Runanga	64073	V3pLWRP-165	Rule 15.5.40	Delete Rules 15.5.39 and 15.5.40 and replace with new discretionary activity rule	Oppose in part Support in part	There should be provision for some transfers as controlled activity as proposed
Ngai Tahu and Nga Runanga	64073	V3pLWRP-166	Rule 15.5.39	Delete Rules 15.5.39 and 15.5.40 and replace with new discretionary activity rule	Oppose in part Support in part	Discretionary activity is appropriate where Rule 15.5.39 is not met
Fonterra Co-operative Group Ltd	64090	V3pLWRP-993	Rule 15.5.40	Amend Rule 15.5.40	Support in part	There needs to be appropriate discretionary activity rule for water transfers
Central SI Fish and Game	53274	V3pLWRP-380	Table 15a)	Amend Table 15a)	Oppose	The table provides for relevant matters
Central SI Fish and Game	53274	V3pLWRP-382	Table 15c)	Amend Table 15c)	Oppose	The table provides for relevant matters
Central SI Fish and Game	53274	V3pLWRP-362	Table 15d)	Amend Table 15d) to include target dates	Oppose	The dates sought are not specified.
Central SI Fish	53274	V3pLWRP-363	Table 15e)	Amend Table 15e) to include target dates	Oppose	The dates sought are not specified.

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
and Game						
Ngai Tahu and Nga Runanga	64073	V3pLWRP-167	Table 15 f)	Amend	Support	The discretion of the consent authority is more appropriate than individual water supply strategies
Central SI Fish and Game	53274	V3pLWRP-383	Table 15 g)	Amend Table 15g) to include new allocation framework	Oppose	The framework should be linked to the NOF.
Central SI Fish and Game	53274	V3pLWRP-384	Table 15 h)	Amend Table 15h) to include new allocation framework	Oppose	The framework should be linked to the NOF.
Ngai Tahu and Nga Runanga	64073	V3pLWRP-161	Table 15 k)	Amend	Support	Numeric allocation limits should be included
Federated Farmers of NZ	64848	V3pLWRP-219	Table 15 m)	Delete or Amend Tables 15m – 15 p)	Support in part	For the reasons given by the submitters
Dairy NZ	63179	V3pLWRP-339	Table 15m)	Delete Table 15m) and include in Rule 15.5.2	Oppose in part Support in part	Reference to MGM is supported but changes to Rule 15.5.2 are opposed
Central SI Fish and Game	53274	V3pLWRP-387	Table 15 m)	Delete Table 15m)	Oppose	Table 15 m) is required for the policy framework in the Plan
Hunter Downs Development Company Ltd	55552	V3pLWRP-671	Table 15 m)	Include note re versions of Overseer	Support in part	There needs to be provision for version control of Overseer
Fonterra Co-operative Group Ltd	64090	V3pLWRP-993	Table 15m)	Delete Table 15m) and include in Rule 15.5.2	Oppose	Changes to Rule 15.5.2 are opposed
Federated Farmers of NZ	64848	V3pLWRP-217	Table 15 n)	Delete or Amend Tables 15m – 15 p)	Support in part	For the reasons given by the submitters
Dairy NZ	63179	V3pLWRP-351	Table 15 n)	Amend Table 15n)	Support in part	Need to ensure that the tables are based on robust modelling
Hunter Downs Development Company Ltd	55552	V3pLWRP-672	Table 15 n)	Include note re versions of Overseer	Support in part	There needs to be provision for version control of Overseer

Submitter Name	Submitter ID	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-917	Table 15n)	Delete maximum cap and include MGM numbers when available	Support in part	There needs to be provision for recognition of MGM
Fonterra Co-operative Group Ltd	64090	V3pLWRP-996	Table 15n)	Amend Table 15n)	Support in part	Need to ensure that the tables are based on robust modelling
Dairy NZ	63179	V3pLWRP-381	Table 15 o)	Amend Table 15o)	Support in part	Need to ensure that the tables are based on robust modelling
Hunter Downs Development Company Ltd	55552	V3pLWRP-673	Table 15 o)	Include note re versions of Overseer	Support in part	There needs to be provision for version control of Overseer
Fonterra Co-operative Group Ltd	64090	V3pLWRP-997	Table 15n)	Amend Table 15o)	Support in part	Need to ensure that the tables are based on robust modelling
Central SI Fish and Game	53274	V3pLWRP-366	Table 15 p)	Amend Table 15p) to lower N limits	Oppose	The policy framework in the plan is based on Table 15 p)
Hunter Downs Development Company Ltd	55552	V3pLWRP-674	Table 15 p)	Include note re versions of Overseer	Support in part	There needs to be provision for version control of Overseer
Fertiliser Assoc of NZ	56725	V3pLWRP-958	Table 15 p	Amend Table 15 p)	Support in part	There should be clarity on Table 15 p)
Ngai Tahu and Nga Runanga	64073	V3pLWRP-170	Schedules	Add new schedule for cultural landscape areas	Oppose	There needs to be consultation with landowners affected by inclusion of a cultural landscape area
Ballance Agri-nutrients Ltd	63247	V3pLWRP-696	Schedule 24b)	Amend	Support in part	For the reasons given by the submitter
Ravensdown Fertiliser Co-operative Ltd	56708	V3pLWRP-919	Schedule 24b)	Amend	Support in part	For the reasons given by the submitter
Fertiliser Assoc of NZ	56725	V3pLWRP-959	Schedule 24b)	Amend	Support in part	For the reasons given by the submitter

