

From: [Chris Hansen](#)
To: [Mailroom Mailbox](#)
Cc: [Shaun Burkett](#)
Subject: TRIM: Variation 3 to the Proposed Canterbury Land & Water Regional Plan - further submission
Date: Friday, 17 July 2015 11:45:48 a.m.
Attachments: [RAV ECan Var 3 South Coast Canterbury FINAL further submission 170715.pdf](#)

EC124449

Please find attached a further submission on behalf of Ravensdown Fertiliser Co-operative Ltd to Variation 3 to the PCLWRP.

Please contact me in the first instance if you have any questions.

Chris Hansen
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FURTHER SUBMISSION ON PROPOSED VARIATION 3 TO THE PROPOSED CANTERBURY LAND & WATER REGIONAL PLAN

(Closing date: 5pm Friday 17 July 2015)

To: Chief Executive Officer
Environment Canterbury
P O Box 345,
Christchurch

Further Submission on: Proposed Variation 3 to the Proposed Canterbury Land & Water Regional Plan (PCLWRP)

Name of Submitter: Ravensdown Fertiliser Co-operative Ltd.

Address of Submitter: C/- CHC Ltd
PO Box 51-282
Tawa
WELLINGTON 5249
Attention: Chris Hansen

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1. A detailed further submission is attached.
2. Ravensdown Fertiliser Co-operative Ltd (Ravensdown) is an organisation who has an interest in the variation that is greater than the interest the general public has.
3. Ravensdown wishes to be heard in support of this further submission.
4. Ravensdown would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.



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Chris Hansen

Authorised Agent of Ravensdown Fertiliser
Co-operative Ltd

17 July 2015
.....

Date

Submitter ID/Name	Point ID	Plan Provision	Support/ Oppose	Reason
Submitter No. 64848 - South Canterbury Province, Federated Farmers of New Zealand	V3pLWRP-173	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to replace maximum cap numbers in Variation 3 with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-174	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to amend Variation 3 to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of OVERSEER [®] . Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-176	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to align Variation 3 with the Nutrient Management Variation (which will incorporate Matrix of Good Management (MGM) N loss benchmarks and good management practices into the LWRP) to enable the incorporation of MGM benchmarks and practices into Variation 3. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-183	Policy 15.4.2	Support in part	The submitter seeks for Council to amend Policy 15.4.2 by adding the following words: <i>“The load limits in Tables 15(o) and 15(p) will be reviewed when the MGM project is complete...”</i> Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-194	Policy 15.4.13	Support	The submitter seeks Council to clarify the intent of Policy 15.4.13. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-216	Policy 15.4.35	Support	The submitter seeks Council to delete Policy 15.4.35 part (b) or extend the duration to at least 20 years. Ravensdown supports this submission as the policy as currently written is unreasonable and not consistent with the timeframes provided for in the RMA.

	V3pLWRP-241	Rule 15.5.8	Support	The submitter seeks Council to amend Rule 15.5.8 to a Non-complying Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-217	Table 15(n)	Support	The submitter seeks Council to either delate Table 15(n) or amend as follows: <i>“1. Replace maximum cap numbers in Table 15(n) with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project.”</i> Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
Submitter No. 52267 - Horticulture New Zealand	V3pLWRP-273	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to amend Variation 3 so that all numbers, including limits and targets, N loads, flexibility caps and maximum caps to be adjusted to match new versions of OVERSEER [®] . Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-274	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to amend and completely review the Variation once the MGM project is complete, ensure that the use of MGM is both reasonable and practical and consistent with the new versions of OVERSEER [®] .
	V3pLWRP-286	South Coastal Canterbury Definitions 15.1	Support	The submitter seeks Council to amend the definition of ‘flexibility cap’ and recommends the amended words. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-288	South Coastal Canterbury Definitions 15.1	Oppose	The submitter seeks Council to amend the definition of "Maximum cap" by adding the words “...adjusted following release of updated OVERSEER [®] version.” Ravensdown opposes the use of the term ‘maximum cap’ and any amendments to the definition of that term as the term is inappropriate and should be replaced by GMP values derived from the MGM Project.
	V3pLWRP-322	Rule 15.5.4	Support	The submitter seeks Council to amend Rule 15.5.4 to a Discretionary Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management

				practice.
	V3pLWRP-323	Rule 15.5.5	Support	The submitter seeks Council to amend Rule 15.5.5 to a Non-complying Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-324	Rule 15.5.6	Support	The submitter seeks Council to amend Rule 15.5.6 to a Restricted Discretionary Activity and include matters of discretion that take into account the rotational nature of the operation and industry good management practice. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-327	Rule 15.5.7	Support	The submitter seeks Council to amend Rule 15.5.7 to a Discretionary Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-328	Rule 15.5.8	Support	The submitter seeks Council to amend Rule 15.5.8 to a Non-complying Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-346 V3pLWRP-347 V3pLWRP-348	Table 15(m); Table 15(n); Table 15(p)	Support	The submitter seeks an amendment to Tables 15(m); 15(n) and 15(p) by including a note as follows: <i>“This table will be updated when a new version of OVERSEER® is released.”</i> Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
Submitter No. 53274 -Central South Island Fish and Game	V3pLWRP-357	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Oppose	The submitter seeks Council to add new table/provisions of values of waterbodies. Ravensdown oppose the inclusion of these values as they are inappropriate and unnecessary. Proposed Variation 3 appropriately identifies water quality values consistent with the implementation of the NPS Freshwater Management and does not need amendment.

	V3pLWRP-358	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Oppose	The submitter seeks Council to identify contact recreation sites in relation to the regional salmonids fishery and include these as "contact recreational sites," incorporate numerical water quality and quantity limits to protect these values, and include rules in relation to those identified water which must ensure the standards set out in Schedule 3 [to the RMA] are complied with. Ravensdown opposes the inclusion of these provisions as they are inappropriate and unnecessary. Proposed Variation 3 appropriately identifies water quality values consistent with the implementation of the NPS Freshwater Management and does not need amendment.
	V3pLWRP-368	Policy 15.4.4	Oppose	The submitter seeks amendments to Policy 15.4.4 as follows: <i>“(a) all farming activities to <u>comply with the nutrient discharge allowance operate at good management practice or better</u> ; and (b) all farming activities to <u>prepare and implement farm environment management plans the preparation and implementation of a Farm Environment Plan in accordance with Schedule 24B, which sets out and defines good environmental management practice to reduce current nitrogen, phosphorus and microbial contaminant losses for the use of land for any farming activity subject to a resource consent.</u>”</i> Ravensdown opposes the amendment to (a) as there is no nutrient discharge allowance provided in Variation 3. Ravensdown opposes the amendment to (b) as a farming activity should only be required to provide a FEP as part of a resource consent process, and not to be a permitted activity. Ravensdown considers the amendments sought are inappropriate and unnecessary and do not represent sound resource management practice.
	V3pLWRP-378	Rule 15.5.2	Oppose	The submitter seeks a new Condition 6 be added: <i>“6. A Farm Environment Plan has been prepared and is being implemented in accordance with Schedule 7 Part A, and supplied to the Canterbury Regional Council on request.”</i> Ravensdown opposes the amendment to Rule 15.5.2 as a farming activity should only be required to provide a FEP as part of a resource consent process, and not to be a permitted activity. Ravensdown considers the amendment sought is inappropriate and unnecessary and does not represent sound resource management practice.
	V3pLWRP-366	Table 15(p)	Oppose	The submitter seeks Council to amend Table 15(p) to include amended and lower Nitrogen load limits (tonnes per year) from 2030. Ravensdown opposes this request as it is not clear what ‘lower’ nitrogen load limits are expected to be met from 2030. The proposed amendment is unnecessary

				and inappropriate and does not represent sound resource management practice.
Submitter No. 53683 - Dairy Holdings Limited	V3pLWRP-398	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks that the provisions and load limits within Variation 3 be revisited and updated in light of the Matrix of Good Management (MGM) and for any reductions in nitrogen loss rates (and timings of those reductions) to be reviewed once the outcomes of the MGM project are known. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-415	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to provide for a rule to the effect that if OVERSEER [®] is updated, the most recent version can be used to both: (a) re-calculate any N-loss limit/load (including nitrogen baseline) described in a plan provision; and (b) assess compliance against the re-calculated N-loss limit/load (including the nitrogen baseline) In both cases it would be a condition of the rule that the same input data would be used. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-405	Policy 15.4	Support	The submitter seeks Council to insert a new Policy 15.4.13A after Policy 15.4.13 and recommends the wording of this new policy. Ravensdown supports the inclusion of the new policy which is consistent with Variation 2 to the PCLWRP and has planning merit.
Submitter No. 55552 - Hunter Downs Development Company Limited	V3pLWRP-637	Policy 15.4.4	Support	The submitter seeks Council to amend Policy 15.4.4 by removing the words "or better". Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-659	Rule 15.5	Support	The submitter seeks Council to insert a new Rule (15.5.11A) as follows: <i>“The use of land for a farming activity on a property that is supplied with water by an irrigation scheme, is a permitted activity provided the following conditions are met:</i> <i>1. The irrigation scheme holds a nitrogen discharge consent for the area where the property is located.”</i> Ravensdown supports this submission as it is consistent with its own

				submission on this matter, and represents sound resource management practice.
	V3pLWRP-671 V3pLWRP-672 V3pLWRP-674	Table 15 (m); Table 15(n); Table 15(p)	Support	The submitter seeks Council to amend Tables 15(m); 15(n) and 15(p) by having a footnote as follows: <i>“[x] If OVERSEER® is updated, the most recent version shall be used to recalculate the nitrogen loss limit in [Table X] using the same input data (at which point the new loss limit will apply).”</i> Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
Submitter No. 64125 - Beef and Lamb New Zealand Ltd	V3pLWRP-786	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to recalculate the total catchment load based on achieving water quality outcomes in the receiving environment. Only use the latest version of OVERSEER® to inform relative progress towards achievement of individual nitrogen discharge limits. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-795	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter seeks Council to delay to the hearing of the submissions on Variation 3 until the adoption of a region wide Variation that incorporates new information determined by the Matrix of Good Management project. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
Submitter No. 64073 - Ngāi Tahu and Nga Rūnanga	V3pLWRP-113	South Coastal Canterbury Definitions 15.1	Oppose	The submitter seeks Council to delete the definition of 'existing farming activity' and replace it with a new definition of "Change in Land Use" - see Submission Point ID V3pLWRP-117. Ravensdown opposes this submission request as the definition of 'existing farming activity' is used through the proposed Variation and deleting this phrase would have implications on the provisions and the outcomes sought.
	V3pLWRP-114	South Coastal Canterbury Definitions 15.1	Oppose	The submitter seeks Council to delete the definition of 'new farming activity' and replace it with a new definition of "Change in Land Use" - see Submission Point ID V3pLWRP-117. Ravensdown opposes this submission request as the definition of 'new farming activity' is used through the proposed Variation and deleting this phrase would have implications on the provisions and the outcomes sought.

	V3pLWRP-117	South Coastal Canterbury Definitions 15.1	Oppose	The submitter seeks Council to include a new definition of ‘change in land use’ and proposes a definition. Ravensdown opposes the definition proposed which is not effects based and has no planning merit.
	V3pLWRP-118	South Coastal Canterbury Definitions 15.1	Support	The submitter seeks the deletion of the definition of Nitrogen Baseline. Ravensdown agrees with this request as Nitrogen Baseline is already defined in the PCL&WRP and no definition is required in the Variation.
	V3pLWRP-127 V3pLWRP-128	Policies 15.4.1 and 15.4.4	Support	The submitter seeks for Council to delete Policies 15.4.1 and 15.4.4 and replace with a new policy as follows: <i>“Maintain or improve water quality and minimize the discharge of contaminants into water in the South Canterbury Coastal Area by:</i> <i>(i) Excluding intensively farmed livestock from having access to lakes, rivers and drains (except for stock crossing points);</i> <i>(ii) Requiring all farming activities to adopt the good management practices set out in Schedule 24b; and</i> <i>(iii) requiring any farming activity which requires a resource consent to develop and implement a Farm Environment Plan prepared in accordance with Schedule 7.”</i> Ravensdown supports the deletion of the policies and the new policy proposed as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-147	Rule 15.5.1	Oppose	The submitter seeks for Council to amend Rule 15.5.1 by adding a new condition after the words "permitted activity" : ...provided the following condition is complied with: <i>“(a) The estimated nitrogen losses from the property do not exceed the flexibility caps set out in Table 15(m).”</i> Ravensdown opposes this additional condition to the permitted activity status for the use of land for farming as the current condition (less than 5ha) is appropriate and ensures adverse effects are minimised. The proposed amendment is onerous and unnecessary, and does not represent sound resource management practice.
	V3pLWRP-150	Rule 15.5.8	Support	The submitter seeks Council to amend Rule 15.5.8 to a Non-complying Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.

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Submitter No. 63179 – DairyNZ	V3pLWRP-399	Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	Support	The submitter strongly encourages the Council to look at aligning the two planning processes [Nutrient Management Plan Change to introduce the Matrix of Good Management and Variation 3] and delay the hearing of Variation 3 so as to hear the two planning processes together. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-239 V3pLWRP-254	Policies 15.4.1 and 15.4.4	Support	The submitter seeks Council to delete Policies 15.4.1 and 15.4.4 and replace them with the following policy: <i>“Reduce the impact of farming activities on water quality of the South Canterbury Area by requiring:</i> <i>a) all farming activities to adopt the Good Management Practices set out in Schedule 24b unless alternative practices are more appropriate; and</i> <i>b) the preparation and implementation of a Farm Environment Plan for the use of any land by any farming activity requiring a resource consent; and</i> <i>c) the exclusion of intensively farmed stock from drains (in additional to the region wide stock exclusion provisions).”</i> Ravensdown supports the deletion of the policies and the new policy proposed as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-265	Policy 15.4.6	Support	The submitter seeks amendments to Policy 15.4.6 relating to farming activities prior to 15 May 2015 and an increase in nitrogen loss above the nitrogen baseline being capped at 5kgN/ha/yr. Ravensdown supports this submission as the amendments proposed are appropriate and necessary, and represents sound resource management practice.
	V3pLWRP-339 V3pLWRP-351	Table 15(m); Table 15(n)	Support	The submitter seeks Council amend Tables 15(m) and 15(n) and requests that as the MGM process is due to release its output in September 2015 that decisions on numbers in Tables 15(m), (n) and (o) (and flexibility caps) be deferred (if necessary) to ensure they are based on best available information . Ravensdown supports this submission as the amendments proposed are appropriate and necessary, and represents sound resource management practice.
Submitter No. 61382 – NZ Pork Industry Board	V3pLWRP-682	South Coastal Canterbury Definitions 15.1	Support	The submitter seeks Council to delete definition and all references to "Maximum cap" because this cannot be defined as the only available tools

				have a margin of error of up to 30%. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
Submitter No. 63247 - Ballance Agri-Nutrients Limited	V3pLWRP-696	Schedule 24b- Farm Practices	Oppose	The submitter seeks Council to make a number of amendments to Schedule 24a(a)(i), including adding a new (a) that reads: <i>“(a) The use of land for a farming activity results in a material change defined as an increase in modelled nitrogen or phosphorus losses over a property which exceed 10% over the previous year’s nutrient budget;”</i> Ravensdown opposes the inclusion of this new clause as the definition of ‘material change’ included in it is inappropriate and not effects based.
Submitter No. 56725 - Fertiliser Association of New Zealand	V3pLWRP-700	South Coastal Canterbury Definitions 15.1	Support	The submitter seeks Council to amend the definition of ‘new farming activity’ and provides a recommended amendment. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-703	Policy 15.4	Support	The submitter seeks Council to amend Section 15A, 15.4 by adding the following words after the first sentence: <i>“Where a conflict in policy occurs, the policies in Section 15.4 prevail over policies in Section 4 of the Plan”</i> . Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-714	Policy 15.4.13	Support	The submitter seeks Council to clarify the intent of Policy 15.4.13. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-946	Rule 15.5.5	Support	The submitter seeks Council to amend Rule 15.5.5 to a Discretionary Activity. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.

	V3pLWRP-947	Rule 15.5.6	Support	The submitter seeks Council to amend Rule 15.5.6 to remove ambiguity in its meaning and remove inconsistency between provisions (2) and (3) and delete condition (3) and replace with an alternative provided in the submission which is consistent with the pLWRP Variation 2 version. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-958	Table 15(p)	Support	The submitter seeks Council to Amend Table15(p) to: <i>“a) provide clarity of the intention and application of the load limits and how they relate to baseline limits, flexibility cap limits and maximum cap limits being applied to meet catchment loads; and b) amend the zero and 1 t/yr limits.”</i> Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
	V3pLWRP-959	Schedule 24b- Farm Practices	Support	The submitter seeks Council to replace Schedule 24b (a)(i) with the same wording as Schedule 24(a) in the recommended version of the PCLWRP Variation 1, adopted by Council 23 April 2015. Ravensdown supports this request as it is appropriate and necessary, and represents sound resource management practice.
Submitter No. 64011 - Oceania Dairy Limited	V3pLWRP-10	Rule 15.5.2	Support	The submitter seeks Council to amend Rule 15.5.2 to require farming activities to operate at good management practice as defined in the most recent version of the Matrix of Good Management (MGM) and achieve the nitrogen losses for the farming type, soil type and climate shown in that version of the MGM. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.
Submission No. 64087 - Nutrient Allocation Reference Group Low Emitters Group	V3pLWRP-738 V3pLWRP-739 V3pLWRP-740	Table 15(m); Table (n); Table 15(p)	Support	The submitter seeks Council to amend Tables 15(m); 15(n) and 15(p) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data. Ravensdown supports this submission as it is consistent with its own submission on this matter, and represents sound resource management practice.

