

**From:** [Chris Hansen](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Shaun Burkett](#)  
**Subject:** Further submission to submissions to Proposed Plan Change 5 - Canterbury Land & Water Regional Plan  
**Date:** Friday, 13 May 2016 4:11:58 p.m.  
**Attachments:** [FINAL FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 5\\_130516.pdf](#)

---

Please find attached a further submission on behalf of Ravensdown Limited to submissions to Proposed Plan Change 5 - Canterbury Land & Water Regional Plan.

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

Kind regards

Chris

Chris Hansen  
RMA Planning Consultant/Company Director  
*Chris Hansen Consultants Ltd*  
*P O Box 51-282*  
*Tawa, Wellington 5249*  
*ph: 02102645108*



# **FURTHER SUBMISSION ON PROPOSED PLAN CHANGE 5 TO THE CANTERBURY LAND & WATER REGIONAL PLAN**

(Closing date: 5pm Friday 13 May 2016)

**To:**

Chief Executive Officer  
Environment Canterbury  
P O Box 345,  
Christchurch

**Further Submission on:**

Proposed Plan Change 5 to the Canterbury Land & Water  
Regional Plan

**Name of Submitter:**

Ravensdown Fertiliser Co-operative Ltd.

**Address of Submitter:**

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

Phone: 021 026 45 108  
Email: Chris@rmaexpert.co.nz

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.



.....  
Chris Hansen

Authorised Agent of Ravensdown Fertiliser  
Co-operative Ltd

13 May 2016  
.....

Date

Submitter ID/Name	Point ID	Plan Provision	Support/ Oppose	Reason
Dairy NZ	249	General	Support	The submitter lists the matters they support in PC 5 and request be retained, and lists the matters that need amending in PC 5 to address their concerns. Ravensdown supports the matters supported/amendments sought to PC 5 as these are consistent with those matters raised in its own submission, and represent sound resource management practise.
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	724	General	Support	The submitter lists the matters they support in PC 5 and request be retained, and lists the matters that need amending in PC 5 to address their concerns. Ravensdown supports the matters supported/amendments sought to PC 5 as these are consistent with those matters raised in its own submission, and represent sound resource management practise.
Canterbury District Health Board	1351	General	Oppose	<p>The submitter seeks an amendment to PC 5 to:</p> <p><i>“... include a staged approach with sufficient monitoring to ensure stream nutrient levels remain within those set by the plan, and that 90% is the minimum [protection level] achieved.</i></p> <p><i>AND</i></p> <p><i>replace [the word] 'avoiding' with stronger terminology, e.g. 'preventing' across all policies.”</i></p> <p>Ravensdown opposes the requests of the submitter and supports the current intention of PC 5 in regards to stream nutrient levels and the use of the term ‘avoid’ which is consistent with the package of mitigation intended under the RMA. Ravensdown considers the amendments requested are unnecessary and inappropriate, and the current intent of PC 5 should be retained.</p>
Fonterra Co-operative Group Ltd & Others	2050	General	Support	<p>The submitter seeks an amendment to the policies and rules and associated definitions to remove the reliance on the Good Management Practice Loss Rates.</p> <p>OR</p> <p>Amend PC5 to ensure Good Management Practice Loss Rates be determined with reference to the highest annual discharge of nitrogen (at GMP) over the preceding four-year period.</p>

				<p>AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.</p> <p>Ravensdown supports the amendments sought by the submitter that are consistent with its own submission and are considered to represent sound resource management practice.</p>
Dairy Holdings Limited	2726	General	Support	<p>The submitter seeks a mechanism to be included in PC 5 requiring the Council to review and if necessary to update proxys/inputs that underpin the Farm Portal [by way of plan change in the case of material amendments].</p> <p>Ravensdown supports the amendments sought by the submitter that are consistent with its own submission and are considered to represent sound resource management practice.</p>
Federated Farmers of NZ	2761	General	Support	<p>The submitter seeks an amendment to PC 5 to incorporate GMP Loss Rate within the FEP process rather than using it as the basis for granting consent.</p> <p>AND</p> <p>Require permitted activities to operate at good management practice as defined in the document <i>'Industry-agreed Good Management Practices relating to water quality'</i>.</p> <p>Ravensdown supports the amendments sought by the submitter that are consistent with its own submission and are considered to represent sound resource management practice.</p>
Horticulture New Zealand	1543	General	Support	<p>The submitter seeks an amendment to PC5 to include all documents which will be used to implement the plan, and provide opportunity for consultation and submission for such documents to be incorporated into the Plan;</p> <p>And make any consequential amendments.</p> <p>Ravensdown supports the amendments sought by the submitter that are consistent with its own submission and are considered to represent sound resource management practice.</p>
DairyNZ	205	Definitions: Accredited Farm Consultant	Support	<p>The submitter seeks the definition <i>'Accredited Farm Consultant'</i> be retain as notified.</p>

				Ravensdown supports this request as it is consistent with its own submission that considers the definition is appropriate and necessary when implementing the provisions of PC 5.
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	750	Definitions: Certified Farm Environmental Plan Auditor	Oppose	<p>The submitter seeks an amendment to the definition of '<i>Certified Farm Environment Plan Auditor</i>' to include an additional requirement as follows:</p> <p><u>Has completed a course approved by Te Rūnanga o Ngāi Tahu and supplied to Environment Canterbury that addresses cultural competencies.</u></p> <p>And any consequential amendments.</p> <p>Ravensdown opposes this request as the definition included in PC 5 is consistent with an industry agreed and recognised definition and the amendments requested are unnecessary and inappropriate.</p>
DairyNZ	207	Definitions: Baseline GMP Loss Rate	Support	The submitter seeks a number of amendments to the definition of ' <i>Baseline GMP Loss Rate</i> ' that are similar to the amendments sought by Ravensdown in its submission. Ravensdown supports these amendments which are considered to represent sound resource management practice.
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	752	Definitions: Good Management Practice	Oppose	<p>The submitter seeks an amendment to the definition of '<i>Good Management Practices</i>' to address, as a specific aspect of Good Management Practice, the effects of farming activities on mahinga kai, wāhi tapu, wāhi taonga and the exercise of kaitiakitanga.</p> <p>Ravensdown opposes the request as it is not consistent with its own submission which supports the definition of '<i>Good Management Practice</i>' included in PC 5 as it is consistent with the industry agreed definition. Ravensdown considers there is no justification nor necessity to amend this recognised definition.</p>
DairyNZ	210	Definition: Good Management Practice	Support	<p>The submitter seeks the definition '<i>Good Management Practice</i>' be retain as notified.</p> <p>Ravensdown supports this request as it is consistent with its own submission that considers the definition is appropriate and necessary when implementing the provisions of PC 5.</p>
Barrhill Chertsey Irrigation	389	Definition: Good Management Practice	Support	The submitter seeks the definition ' <i>Good Management Practice</i> ' be retain as notified.

				Ravensdown supports this request as it is consistent with its own submission that considers the definition is appropriate and necessary when implementing the provisions of PC 5.
Forest and Bird NZ	1787	Definition: Good Management Practice	Oppose	<p>The submitter seeks an amendment to the definition of '<i>Good Management Practices</i>' to provide some more guidance about the practices it is referring to.</p> <p>Ravensdown opposes this request as it is not consistent with its own submission that considers the current definition is appropriate and necessary when implementing the provisions of PC 5.</p>
Barrhill Chertsey Irrigation	392	New Definition: Nutrient User Group	Support	<p>The submitter seeks a new definition '<i>Nutrient User Group</i>' be included in PC 5, and suggests wording for the definition.</p> <p>Ravensdown supports this request as it considers the proposed definition is appropriate and necessary when implementing the provisions of PC 5.</p>
Dairy Holdings Limited	171	New Definition: Nutrient User Group	Support	<p>The submitter seeks a new definition '<i>Nutrient User Group</i>' be included in PC 5, and suggests wording for the definition.</p> <p>Ravensdown supports this request as it considers the proposed definition is appropriate and necessary when implementing the provisions of PC 5.</p>
DairyNZ	213	New Definition: Loss Rate Assessed as Good Management Practice	Support	<p>The submitter seeks a new definition '<i>Loss Rate Assessed as Good Management Practice</i>' be included in PC 5, and suggests wording for the definition.</p> <p>Ravensdown supports this request as it considers the proposed definition is appropriate and necessary when implementing the provisions of PC 5.</p>
Fonterra Co-operative Group Ltd & Others	1854	New Definition: Loss Rate Assessed as Good Management Practice	Support	<p>The submitter seeks a new definition of '<i>Loss Rate Assessed as Good Management Practice</i>' as follows:</p> <p><u>means the average nitrogen loss rate below the root zone that is estimated by OVERSEER to occur over the most recent four year period based on the farm property adopting Good Management Practices.</u></p> <p>AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.</p> <p>Ravensdown supports this request as it considers the proposed definition is appropriate and necessary when implementing the provisions of PC 5.</p>
DairyNZ	214	New Definition: Loss Rate Assessed as Baseline GMP	Support	<p>The submitter seeks a new definition '<i>Loss Rate Assessed as Baseline GMP</i>' be included in PC 5, and suggests wording for the definition.</p>

				Ravensdown supports this request as it considers the proposed definition is appropriate and necessary when implementing the provisions of PC 5.
Fonterra Co-operative Group Ltd & Others	1854	New Definition: Loss Rate Assessed as Baseline GMP	Support	<p>The submitter seeks a new definition of 'Loss Rate Assessed as Baseline GMP' as follows:</p> <p><u>means the average nitrogen loss rate below the root zone that is estimated to by OVERSEER have occurred over the baseline period based on the farm property adopting Good Management Practices.</u></p> <p>AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.</p> <p>Ravensdown supports this request as it considers the proposed definition is appropriate and necessary when implementing the provisions of PC 5.</p>
Dairy Holdings Limited	172	Definition: Winter Grazing	Support	<p>The submitter seeks an amendment to the definition of 'Winter grazing' that are similar to the amendments sought by Ravensdown in its submission.</p> <p>Ravensdown supports these amendments which are considered to represent sound resource management practice.</p>
DairyNZ	222	Definition: Winter Grazing	Support	<p>The submitter seeks an amendment to the definition of 'Winter Grazing' that are similar to the amendments sought by Ravensdown in its submission.</p> <p>Ravensdown supports these amendments which are considered to represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	1064	Definition: Winter grazing	Support	<p>The submitter seeks an amendment to the definition of 'Winter Grazing' that are similar to the amendments sought by Ravensdown in its submission.</p> <p>Ravensdown supports these amendments which are considered to represent sound resource management practice.</p>
Rangatahi Downs Land Trust McLean G and M Forrester J and R Munroe AR and KH Maungatahi Farm Limited	2410 2413 2499 2594 2612	Definition: Change of land use	Oppose	<p>The submitters seek a new definition of 'Change of land use' be included in PC 5, as follows:</p> <p><u>means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or</u></p> <p><u>- Any increase in the number of cattle 'winter grazed' on a property; or</u></p> <p><u>- Any change to a dairy system;</u></p>

				<p><u>From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed.</u></p> <p>Ravensdown opposes the inclusion of this new definition as it is considered the amendments requested are unnecessary and inappropriate, and the current intent of PC 5 should be retained.</p>
Dairy Holdings Ltd	188	Policies: new policy	Support	<p>The submitter requests a new policy be introduced into PC 5 as follows:</p> <p><u>4.33CC To enable resource consent to be obtained for a farming activity with a nitrogen loss that is greater than its Baseline GMP Loss Rate or Good Management Practice Loss Rate, provided that the applicant demonstrates:</u></p> <p><u>(a) the nitrogen loss does not exceed the nitrogen baseline; or</u></p> <p><u>(b) that the nitrogen loss was authorised by a resource consent that was granted prior to 13 February 2016 (including any renewal or replacement of that resource consent after 13 February 2016), and;</u></p> <p><u>(c) the Farm Portal does not provide accurate or realistic Baseline GMP Loss rates for the farming activity undertaken; and</u></p> <p><u>(d) good management practices and the matters set out in Schedule 28 are being achieved.</u></p> <p>Ravensdown supports the new policy requested as it is considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Barrhill Chertsey Irrigation	672	Policies: new policy	Support	<p>The submitter seeks new policy 4.33CC be introduced to PC 5, with the same wording as requested by Dairy NZ above.</p> <p>Ravensdown supports the new policy requested as it is considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Dairy Holdings Limited	194	Policies: new policy	Support	<p>The submitter seeks a new policy be introduced to PC 5 as follows:</p> <p><u>4.41DD Applications by farm enterprises for a resource consent for the use of land for a farming enterprise or the discharge of nutrients are to be accompanied by an Environmental Management Strategy that describes:</u></p> <p><u>(a) how the nutrient load for which resource consent is sought has been calculated, and the rationale for that nutrient load applied; and</u></p>



				<p><u>(b) how nutrients from all land subject to the farming enterprise will be accounted for; and</u></p> <p><u>(c) how properties joining or leaving the farming enterprise are to be managed, including the method to be used to calculate the nutrient load that will be allocated to any property leaving the farming enterprise; and</u></p> <p><u>(d) the proposed monitoring and reporting regime to the CRC, including, but not limited to, a description of the:</u></p> <p><u>(i) audit systems that will be used to assess individual on-farm compliance with the content of any Farm Environment Plan; and</u></p> <p><u>(ii) methods used to address non-compliances identified in individual on-farm audits; and</u></p> <p><u>(iii) proposed data to be collected and the frequency of any proposed reporting to the CRC.</u></p> <p>Ravensdown supports the new policy requested as it is considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Barrhill Chertsey Irrigation	678	Policies: new policy	Support	<p>The submitter seeks new policy 4.41DD be introduced to PC 5, with the same wording as requested by Dairy NZ above.</p> <p>Ravensdown supports the new policy requested as it is considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Dairy Holdings Limited	246	Policies: new policy	Support	<p>The submitter seeks a new policy be introduced to PC 5 as follows:</p> <p><u>Reviews of the Farm Portal will be undertaken annually by the Canterbury Regional Council for the purposes of ensuring that:</u></p> <p><u>(a) the Farm Portal includes accurate and up to date settings, parameters and formulae that correctly reflect Good Management Practices as included in Schedule 28; and</u></p> <p><u>(b) the terminology and settings used in the Farm Portal are adjusted to align with the latest version of OVERSEER®; and</u></p> <p><u>(c) that any consequential changes in:</u></p> <p><u>(i) the Good Management Practices and Good Management Practice modelling Rules as incorporated into Schedule 28; or</u></p>

				<p><u>(ii) the settings, parameters and formulae within the Farm Portal that result in a change to the Baseline GMP Loss Rate or Good Management Practice Loss Rate that might apply to an individual farming operation are incorporated by way of plan change into Schedule 28 and the Farm Portal.</u></p> <p><u>In preparing any plan change as contemplated by Policy [X](c), the Council will:</u></p> <p style="padding-left: 40px;"><u>(a) establish methods and a timeframe for the implementation of any revised Baseline GMP Loss Rate and Good Management Practice Loss Rate.</u></p> <p>Ravensdown supports the new policy requested as it is considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Barrhill Chertsey Irrigation	687	Policies: new policy	Support	<p>The submitter seeks new policy relating to the review of the Farm Portal be introduced to PC 5, with the same wording as requested by Dairy NZ above.</p> <p>Ravensdown supports the new policy requested as it is considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Fonterra Co-operative Group Ltd & Others	1074	Policy 4.11	Support	<p>The submitter seeks an amendment to Policy 4.11 that restricts the 5-year duration consent period to Red or Orange zones, and provides a 15-year duration in the Green or light Blue Zones.</p> <p>Ravensdown supports this request as it is consistent with the concerns raised in its own submission, and represents a more appropriate and pragmatic approach to limiting consent duration.</p>
North Canterbury Fish and Game & SI Fish and Game	691	Policy 4.34	Oppose	<p>The submitter seeks an amendment to Policy 4.34 to include a new clause (d) as follows:</p> <p><u>(d) identify where OVERSEER assumed practices are or were not being met, and quantify against comparative improvements or projected improvements in GMP nutrient reductions.</u></p> <p>AND further or alternative relief to the effect of that sought.</p> <p>Ravensdown opposes the request as it is contrary to its own submission, for reasons provided in its submission. Ravensdown considers the</p>

				additional matter is unnecessary and inappropriate, and has no planning merit.
Forrest & Bird NZ	1798	Policy 4.36	Oppose	<p>The submitter seeks an amendment to Policy 4.36 to delete Policy 4.36(b) unless changes are made to schedule 7A [PC5 LWRP-1847].</p> <p>AND</p> <p>Amend Policy 4.36(bb) as follows:</p> <p><del>farming activities with the potential for more significant nutrient losses, managing their nitrogen loss in accordance with the Good Management Practice Loss Rates and being subject to a resource consent process,</del></p> <p><u>subject to conditions that ensure water quality targets are achieved;</u></p> <p>AND</p> <p>Insert the following:</p> <p><u>Recognise that activities which result in significant losses of nutrients are not appropriate in all locations and avoid such activities in locations where this may result in the water quality targets being breached.</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
DairyNZ Fonterra Co-operative Group Ltd & Others	237; 1864	Policy 4.36bb	Support in part	<p>The submitters seek an amendment to Policy 4.36bb to refer to a Loss Rate Assessed as Good Management Practice.</p> <p>Ravensdown supports in part this amendment as it is considered appropriate and necessary, and has planning merit.</p>
Dairy NZ	239	Policy 4.37	Support	<p>Freshwater quality is improved within the Lake Zone and Red Nutrient Allocation Zone by:</p> <p><u>(ba) including on any resource consent granted for the use of land for a farming activity as a discretionary activity, conditions that:</u></p> <p><u>(i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Loss Rate Assessed as Baseline GMP; and</u></p> <p><u>(ii) require activities to operate at or below the Loss Rate Assessed as Good Management Practice, in any circumstances where that Loss Rate Assessed as Good Management Practice is less than the Loss Rate Assessed as Baseline GMP; and</u></p> <p>Or words to similar effect.</p>

				<p>OR</p> <p>Include an additional formal process for reviewing and moderating random portal results which is developed and agreed with stakeholders, to be used either where CRC has indications that the Baseline GMP Loss Rate calculated is inaccurate or the consent applicant considers this to be the case;</p> <p>OR</p> <p>Amend Policy 4.37 to embed the Good Management Practice Loss Rate within the FEP process, rather than using it as a basis for granting a consent.</p> <p>Ravensdown supports the amendments to the policy requested as they are considered to be consistent with its own submission on this matter, and the new policy has planning merit as it provides clear guidance to council staff and decision makers when implementing the intent of PC 5.</p>
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	792; 812; 877	Policy 4.37; 4.38; new policy in Waitaki sub-region	Oppose	<p>Amend Policy 4.37; 4.38 to insert new clause [ba] and add new policy in Waitaki sub-region as follows:</p> <p><u>(b[a]) Where, as at 13 February 2016, properties nitrogen loss is greater than 15kgs per hectare per annum in the Red Nutrient Allocation Zone and 10kgs per hectare per annum in the Lake Zone there are further reductions in nitrogen loss over time (relative to the properties Baseline GMP Loss Rate or the Good Management Practice Loss Rate whichever is lesser) of not less than:</u></p> <p><u>(i) 15% by 1 January 2025</u></p> <p><u>(ii) 25% by 1 January 2030</u></p> <p><u>(iii) 35% by 1 January 2035</u></p> <p><u>provided that these nitrogen loss reductions do not require the property's nitrogen loss calculation to reduce below the permitted nitrogen baseline in the Red Nutrient Allocation Zone and the Lake Zone.</u></p> <p>And any consequential amendments.</p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice. The requested amendments are also not consistent with the overall approach to nutrient management introduced in PC 5.</p>

Canterbury District Health Board	1214	Policy 4.37	Oppose	<p>The submitter seeks an amendment to Policy 4.37(a) as follows:</p> <p>"(a) <del>avoiding the not granting of</del> any resource consent that will allow the nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate, except where Policy 4.38A applies; ..."</p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice</p>
Fonterra Co-operative Group Ltd & Others	716; 725; 728	Policies 4.37; 4.38; 4.38A	Support	<p>The submitter seeks the terms '<i>Loss Rate Assessed as Good Management Practice</i>' and '<i>Loss Rate Assessed as Baseline GMP</i>' be added to Policies 4.37; 4.38; 4.38A. Ravensdown supports in part these amendments as they are considered appropriate and necessary, and has planning merit.</p>
Forest & Bird NZ	1801	Policy 4.38AA	Oppose	<p>The submitter seeks an amendment to Policy 4.38AA to delete the parts of the policy which provide for a 5kg/ha/yr increase in nitrogen leaching.</p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Canterbury District Health Board	1217	Policy 4.38AB	Oppose	<p>The submitter seeks that Policy 4.38AB is retained as notified. Ravensdown opposes this request which is contrary to its own submission that seeks for this provision to be deleted.</p> <p>Ravensdown opposes this policy as it is considered to be vague and lacks any clear criteria for decision makers, and is contrary to the Permitted Baseline principle, and matters to be considered when assessing the receiving environment.</p>
Barrhill Chertsey Irrigation	656	Policy 4.38AB	Support	<p>The submitter seeks for Policy 4.38AB to be deleted. Ravensdown supports this request as it is consistent with its own submission requesting the policy be deleted, for reasons provided in its submission.</p>
Dairy Holdings Limited	184	Policy 4.38AB	Support	<p>The submitter seeks for Policy 4.38AB to be deleted. Ravensdown supports this request as it is consistent with its own submission requesting the policy to be delete, for reasons provided in its submission.</p>
North Canterbury Fish and Game & SI Fish and Game	694	Policy 4.38AB	Oppose	<p>The submitter seeks the retention of Policy 4.38AB as notified. Ravensdown opposes this request which is contrary to its own submission</p>

				that seeks deletion of Policy 4.38AB, for reasons provided in its submission.
Horticulture New Zealand	1638	Policy 4.38B	Oppose	<p>The submitter seeks an amendment to Policy 4.38B to include thresholds based on a 20 % increase in area irrigated and a 20% increase in stock numbers over which Policy 4.38B is applied.</p> <p>Ravensdown opposes the request as it is contrary to its own submission which seeks to have the policy deleted, for reasons provided in its submission.</p>
Forest & Bird NZ	1806; 1807	Policy 4.38C; 4.38D	Oppose	<p>The submitter seeks an amendment to Policies 4.38C and 4.38D to ensure that the Baseline GMP Loss Rate has effect immediately.</p> <p>Ravensdown opposes this request as it considers there are issues with the Farm Portal that need to be resolved, as outlined in its own submission. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Dairy Holdings Limited	181	Policy 4.38D	Support	<p>The submitter seeks that the timeframes for compliance with the GMP loss rate are extended beyond that notified.</p> <p>Ravensdown supports this request as it is consistent with Ravensdown's own submission, and is considered to represent sound resource management practice.</p>
Forest & Bird NZ	1808	Policy 4.38E	Oppose	<p>The submitter seeks an amendment to Policy 4.38E to direct a resource consent applicant to identify any further areas where phosphorus loss is likely and include direction for phosphorus management to be set out Farm Plans or other provisions to address this submission.</p> <p>Ravensdown opposes this request as it is contrary to its own submission, and considers the amendments sought have no planning merit, and do not represent sound resource management practice.</p>
Forest & Bird NZ	1811	Policy 4.41A	Oppose	<p>The submitter seeks for Policy 4.41A(c) (which provides for a controlled activity pathway) to be deleted.</p> <p>Ravensdown opposes this request as it considers the current PC 5 provisions are appropriate and necessary, and represent sound resource management practice.</p>
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	818	Policy 4.41B	Oppose	<p>The submitter seeks an amendment to Policy 4.41B to include a new clause as follows:</p>

				<p><u>Management Plans and Farm Environment Plans address the effects of farming activity on mahinga kai, and include known sites or areas of wāhi tapu and wāhi taonga.</u></p> <p>And any consequential amendments.</p> <p>Ravensdown does not consider the amendment sought is necessary as PC 5 provisions, and the Canterbury Land &amp; Water Regional Plan, includes provisions to address this matter already.</p>
Forest & Bird NZ	1813	Policy 4.41B	Oppose	<p>The submitter seeks an amendment to Policy 4.41B(f) as follows:  <u>(iii) implementation of progressively more stringent N loss reductions to ensure that water quality is either maintained or where degraded is improved consistent with achieve freshwater objectives/outcomes, water quality limits within a defined time period.</u></p> <p>AND</p> <p>Insert the following new clauses to Policy 4.41B:  <u>(g) taking enforcement action where noncompliance with consent conditions is leading to adverse effects on the environment and posing a risk to attaining the water quality outcomes for the region.</u>  <u>(h) undertaking regular checks of the farm portal information.</u>  <u>(i) analysis of consent and general environmental monitoring results.</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
DairyNZ	263	Policy 4.41B	Support	<p>The submitter requests an amendment to Policy 4.41B as follows;  an alternative consenting pathway in addition to the requirement to not exceed the Baseline GMP Loss Rate, as per Dairy NZ relief sought in relation to these specific policies and rules;</p> <p>OR</p> <p>an additional formal process for reviewing and moderating random portal results that is developed and agreed with stakeholders, to be used either where CRC has indications that the Baseline GMP Loss Rate calculated is inaccurate or the consent applicant considers this to be the case;</p> <p>OR</p>

				<p>the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.</p> <p>Ravensdown supports this request as it is consistent with Ravensdown's own submission, and is considered to represent sound resource management practice.</p>
Forest & Bird NZ	1814; 1815	Policy 4.41C; 4.41D	Oppose	<p>The submitter seeks an amendment to Policies 4.41C and 4.41D to remove the provision for 5kg exceedance and insert the following clauses:</p> <p><u>(c) setting of N leaching standards to maintain water quality where freshwater outcomes are being achieved or reducing contaminant losses consistent with achieving freshwater outcomes over a defined time period.</u></p> <p><u>(d) excluding cattle, deer and pigs from permanent waterbodies and intermittent waterbodies with an active bed greater than 1m.</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	1160	Rules - General	Support	<p>The submitter seeks a new discretionary activity rule for farming enterprises in each nutrient management zone [that use the terms '<i>Loss Rate Assessed as Good Management Practice</i>' and '<i>Loss Rate Assessed as Baseline GMP</i>'] to provide an alternative consent pathway to the Farm Portal;</p> <p>AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought - see original submission for detail.</p> <p>Ravensdown supports the inclusion of a new discretionary activity rule as it is considered to be consistent with its own submission on this matter, and the new rule has planning merit as it implements the intent of the policies introduced by PC 5.</p>
Dairy NZ	328	Rules - General	Support	<p>The submitter seeks a new rule as follows:</p> <p><u>Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not comply with condition 2 of Rule 5.45A is a restricted discretionary activity provided the following conditions are met:</u></p> <p>1. <u>A Farm Environment Plan has been prepared for the property in accordance with Part A of Schedule 7 and is submitted with the</u></p>



				<p><u>application for resource consent; and 2. Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Red Nutrient Allocation Zone does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the Loss Rate Assessed as Baseline GMP unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful.</u></p> <p>Ravensdown supports the inclusion of a new restricted discretionary activity rule as it is considered to be consistent with its own submission on this matter, and the new rule has planning merit as it implements the intent of the policies introduced by PC 5.</p>
Barrhill Chertsey Irrigation	683	Rules: New Rule	Support in part	<p>The submitter seeks a new discretionary activity rule for the use of and for a farming activity on a property that forms part of a Nutrient User Group. Ravensdown supports in part the inclusion of a new discretionary activity rule for this activity as it is considered to have planning merit as it implements the intent of the policies introduced by PC 5.</p>
Dairy Holdings Limited	200	Rules: New Rule	Support in part	<p>The submitter seeks a new discretionary activity rule for the use of and for a farming activity on a property that forms part of a Nutrient User Group. Ravensdown supports in part the inclusion of a new discretionary activity rule for this activity as it is considered to have planning merit as it implements the intent of the policies introduced by PC 5.</p>
Forest & Bird NZ	1816	Rule 5.41A	Oppose	<p>The submitter seeks for an amendment to Rule 5.41A to address:</p> <p>(a) doesn't have any conditions that manage adverse effects;</p> <p>(b) will not achieve the objectives of the plan.</p> <p>OR</p> <p>Revert to previous Rule 5.41.</p> <p>Ravensdown opposes the request as the submission is vague and unclear on what is being sought, and is not consistent with Ravensdown's own submission which sought the rule to be retained as written.</p>
DairyNZ	313	Rule 5.43A	Support	<p>The submitter seeks and amendment to rule 5.43A that clarifies that all land users are expected to operate at the industry-agreed GMP.</p>

				Ravensdown supports this request as it provide clarity to the council staff and decision makers, and assists to implement the policies introduced by PC 5.
DairyNZ	318; 328; 331; 333; 334; 335; 336; 338; 339; 340; 342; 341; 344; 348; 349	Rule 5.45A; 5.45B; 5.46A; 5.47A; 5.48A; 5.49A; 5.50A; 5.52A; 5.53A; 5.54B; 5.55A; 5.56AA; 5.57A; 5.58A; 5.58B	Support	<p>The submitter seeks a number of amendments to these Rules 5.45A; 5.45B; 5.46A; 5.47A; 5.48A; 5.49A; 5.50A; 5.52A; 5.53A; 5.54B; 5.55A; 5.56AA; 5.57A; 5.58A; 5.58B.</p> <p>Ravensdown supports these amendments as they are considered to provide clarity and certainty to the rules, guidance the council staff and decision makers, and assists to implement the policies introduced by PC 5.</p>
Fonterra Co-operative Group Ltd & Others	732; 733; 737; 741; 742; 743	Rules 5.45A; 5.46A; 5.50A; 5.55A; 5.56AA; 5.58A	Support	<p>The submitter seeks the terms '<i>Loss Rate Assessed as Good Management Practice</i>' and '<i>Loss Rate Assessed as Baseline GMP</i>' be added to Rules 5.45A; 5.46A; 5.50A; 5.55A; 5.56AA; 5.58A.</p> <p>Ravensdown supports these amendments as they are considered to provide clarity and certainty to the rules, guidance the council staff and decision makers, and assists to implement the policies introduced by PC 5.</p>
North Canterbury Fish and Game & SI Fish and Game	698	Rule 5.44A(4)	Oppose	<p>The submitter seeks an amendment to Rule 5.44A(4) as follows:</p> <p>The area of the property used for winter grazing within the period 1 May to 1 September does not exceed a total area of 20 hectares, <u>any increase in the area of winter grazing is limited to 10 hectares above that which was winter grazed at 13 February 2016;</u></p> <p>AND further or alternative relief to the effect of that sought.</p> <p>Ravensdown opposes the request as the amendment sought is arbitrary and not effects based, and does not represent sound resource management practice.</p>
North Canterbury Fish and Game & SI Fish and Game	702; 703	Rules 5.48A; 5.52A	Oppose	<p>The submitter seeks the retention of Rules 5.48A and 5.52A as notified.</p> <p>AND further or alternative relief to the effect of that sought.</p> <p>Ravensdown opposes this request as it is contrary to its own submission that seeks the activity status of these rules be amended to non-complying, for reasons provided in its submission.</p>
DairyNZ	354	Schedule 7 FEP	Support in part	<p>The submitter seeks an amendment to the nutrient management target (3).</p> <p>Ravensdown supports in part this request as it is consistent with Ravensdown's own submission, and is considered to represent sound resource management practice.</p>

DairyNZ	312	Schedule 7A	Support	<p>The submitter seeks Schedule 7A to be retain as notified.</p> <p>Ravensdown supports this request as it is consistent with Ravensdown's own submission, and is considered to represent sound resource management practice.</p>
DairyNZ	308	Schedule 28	Support	<p>The submitter seeks an explanation be added to Schedule 28 regarding how any further changes to the schedule should be managed.</p> <p>Ravensdown supports this request as it is consistent with Ravensdown's own submission, and is considered to represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	1853	Schedule 28	Support	<p>The submitter seeks retention of the Farm Portal, but review the [modelling] proxies in Schedule 28 and amend as necessary to ensure that the Farm Portal will produce reliable and realistic GMP loss rates. If there is no review of the proxies, the submitter opposes the entirety of Schedule 28.</p> <p>AND</p> <p>Provide an alternative pathway for considering consent applications for farming activities to farm at GMP that does not rely on the Farm Portal.</p> <p>AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.</p> <p>Ravensdown supports the requests of the submitter as they are considered to be consistent with its own submission on this matter, and are necessary and appropriate to ensure the Farm Portal is a workable mechanism that has planning merit that will implement the intent of the policies introduced by PC 5.</p>
Horticulture New Zealand	1555	Schedule 28	Support	<p>The submitter seeks the deletion of Schedule 28.</p> <p>Ravensdown supports the request of the submitter as it is consistent with its own submission on this matter, for the reasons provided in its submission.</p>
Rangitata Diversion Race Management Limited	496	Schedule 28 - Modelling Rules applied by the Farm Portal	Support	<p>The submitter seeks an amendment to PC5 on the basis of further peer review information as follows: A peer review of the farm portal and Schedule 28 is undertaken and made available to submitters [ Note: see PC5 LWRP-485 for relief sought following a review].</p> <p>Ravensdown supports the request of the submitter as it is considered to be consistent with its own submission on this matter, and is necessary and</p>

				appropriate to ensure the Farm Portal is a workable mechanism that has planning merit that will implement the intent of the policies introduced by PC 5.
Dairy NZ	360	Schedule 28; Method S28.3	Support	<p>The submitter seeks the method to be deleted, or should an alternative methodology be required, an N surplus calculation will be tested and prepared for submission as technical evidence.</p> <p>Ravensdown supports this request as it represents sound resource management practice.</p>
Beef and Lamb New Zealand Ltd & Others	1342; 1370; 1373; 1377; 1381; 1386; 1387; 1389; 1391; 1392; 1395; 1396; 1398; 1401; 1407; 1412; 1415; 1416; 1417; 1418; 1419; 1420; 1421	Rules 5.43A; 5.44A; 5.44B; 5.45A; 5.46A; 5.47A; 5.48A; 5.49A; 5.50A; 5.51A; 5.52A; 5.53A; 5.54A; 5.54B; 5.55A; 5.56AA; 5.56AB; 5.57A; 5.57B; 5.57C; 5.58A; 5.58B; 5.59A	Oppose	<p>The submitter seeks the deletion of Rules 5.43A; 5.44A; 5.44B; 5.45A; 5.46A; 5.47A; 5.48A; 5.49A; 5.50A; 5.51A; 5.52A; 5.53A; 5.54A; 5.54B; 5.55A; 5.56AA; 5.56AB; 5.57A; 5.57B; 5.57C; 5.58A; 5.58B; 5.59A and the replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.</p> <p>Ravensdown opposes this request as deleting the rules is not consistent with its own submission, and the submissions of DairyNZ/Fonterra which it supports. Ravensdown opposes a natural capital approach to the allocation of nitrogen discharge limits. The deletion of the rules does not represent sound resource management practice, and would not result in the implementation of the policies introduced by PC 5.</p>
Beef and Lamb NZ	1373	Rule 5.44B	Oppose	<p>The submitter seeks the deletion of Rule 5.44B(3) which refers to the use of accredited farm consultants in reviewing the FEP/nutrient budget for a controlled activity RC application.</p> <p>Ravensdown opposes this request as it is not consistent with its own submission which supports the use of an accredited advisor for this purpose. The deletion of the rules does not represent sound resource management practice, and would not result in the implementation of the policies introduced by PC 5.</p>
Beef and Lamb NZ	1553	Schedule 7 FEP	Support in part	<p>The submitter seeks that the focus of the Nutrient Management objective is not on maximising nutrient use efficiency as it is not an appropriate measure of improving water quality and is only relevant to the dairy industry.</p> <p>Ravensdown supports in part this submission which is consistent with its own submission and represents sound resource management practice.</p>

Nga Rūnanga and Te Rūnanga O Ngāi Tahu	835; 839; 840; 858	Rule 5.44B; 5.45A; 5.50A; 5.55A	Oppose	<p>The submitter seeks an amendment to Rules 5.44B; 5.45A; 5.50A; 5.55A to include an additional matter of control as follows:</p> <p><u>The nitrogen loss rate reductions applicable to the property to fulfil Policy 4.37(b):</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Forest and Bird NZ	1823	Rule 5.44B	Oppose	<p>The submitter seeks the deletion of Rule 5.44B so that activities that do not comply with Rule 5.43 are restricted discretionary activities.</p> <p>Ravensdown opposes this request as it is contrary to its own submission, and considers the amendments sought have no planning merit, and do not represent sound resource management practice.</p>
Forest and Bird NZ	1829; 1834; 1835; 1840; 1841; 1842	Rule 5.49A; Rule 5.54A; Rule 5.54B; Rule 5.57A; Rule 5.57B; Rules 5.57C;	Oppose	<p>The submitter seeks the deletion of Rule 5.49A and revert to Rule 5.49 [relief sought in PC5 LWRP-1828]; deletion of Rules 5.54A; 5.54B; 5.57B; 5.57C; deletion of Rule 5.57A and revert to Rule 5.57 [relief sought in PC5 LWRP-1839].</p> <p>Ravensdown opposes this request as it is contrary to its own submission, and considers the amendments sought have no planning merit, and do not represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	1082; 1084	Rule 5.56AA; Rule 5.58B	Support	<p>The submitter seeks an amendment to Rules 5.56AA and 5.58B so that the use of land for a farming activity as part of a farming enterprise is a controlled activity, with control reserved over matters listed in its submission.</p> <p>Ravensdown supports this request as it is consistent with its own submission, and is considered to represent sound resource management practice.</p>
Forest & Bird NZ	1838	Rule 5.56AB	Oppose	<p>The submitter seeks an amendment to Rule 5.56AB so that activities that exceed their GMP baseline are prohibited.</p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>

Nga Rūnanga and Te Rūnanga O Ngāi Tahu	860	Rule 5.57B	Oppose	<p>The submitter seeks an amendment to Rule 5.57B to include an additional condition as follows:</p> <p><u>The nitrogen loss calculation for the property does not exceed 15kgs per hectare annum: and</u></p> <p>AND</p> <p>Amend Rule 5.57B to achieve a revision of the 20ha permitted baseline for winter grazing to manage the effects on the receiving environment.</p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Horticulture New Zealand	444	Schedule 7A	Support	<p>The submitter seeks the retention of Schedule 7A.</p> <p>Ravensdown supports this request which is consistent with its own submission, for the reason provided in its submission.</p>
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	861	Schedule 7 – new Management Area	Oppose	<p>The submitter seeks an amendment to Schedule 7 Part B(5) to include a new Management Area as follows:</p> <p><u>Management Area - Mahinga kai values and other sites of importance to Ngāi Tahu</u></p> <p><u>Objective - to recognise and provide for mahinga kai values in any lakes, rivers, wetlands and springs within a property or farming enterprise and for any known wāhi tapu and wāhi taonga within any property or farming enterprise.</u></p> <p><u>Targets -</u></p> <ul style="list-style-type: none"> <li><u>• Include a map(s) or aerial photographs at a scale that clearly shows the location of any known mahinga kai areas, wāhi tapu or wāhi taonga within any property or farming enterprise.</u></li> <li><u>• Managing the effects of farming activities to avoid adverse effects to mahinga kai, wāhi tapu or wāhi taonga.</u></li> </ul> <p>Ravensdown opposes the request as the proposed new management area is vague and uncertain, and it is not clear what area it would cover and what the implications are to the resource user. Ravensdown considers the matters addressed in the Management Area are already addressed on other parts of the Canterbury Land &amp; Water Regional Plan, and PC 5.</p>

Nga Rūnanga and Te Rūnanga O Ngāi Tahu	863	Schedule 7A – additional on-farm action	Oppose	<p>The submitter seeks an amendment to Schedule 7A(3) to include an additional on-farm action as follows:</p> <p><u>To recognise and provide for mahinga kai values in any lakes, rivers, wetlands and springs within a property or farming enterprise and for any known wāhi tapu and wāhi taonga within any property or farming enterprise.</u></p> <p>And any consequential amendments.</p> <p>Ravensdown opposes the request as the proposed new additional on-farm action is vague and uncertain, and it is not clear what area it would cover and what the implications are to the resource user. Ravensdown considers the matters addressed in the additional on-farm action are already addressed on other parts of the Canterbury Land &amp; Water Regional Plan, and PC 5.</p>
Forest and Bird NZ	1885	Policy 15B.4.10(c)	Oppose	<p>The submitter seeks an amendment to Policy 15B.4.10(c) as follows:</p> <p>(c) farming activities with the potential for more significant nutrient losses being subject to a resource consent process <u>which will be subject to conditions that ensure that the water quality limits in 15.7 are achieved.</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Forest and Bird NZ	1888	Policy 15B.4.13	Oppose	<p>The submitter seeks an amendment to Policy 15B.4.13 to clarify that the grant of consent will be limited to the lawful exceedance that existed at 13 February 2016.</p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	1166; 1167; 1171; 1206; 2044; 2057; 2064;	Policies 15B.4.13; 15B.4.14; 15B.4.15; 15B.4.20; 15B.4.24; 15B.4.25; 15B.4.26	Support	<p>The submitter seeks the terms ‘<i>Loss Rate Assessed as Good Management Practice</i>’ and ‘<i>Loss Rate Assessed as Baseline GMP</i>’ be added to Policies 15B.4.13; 15B.4.14; 15B.4.15; 15B.4.20; 15B.4.24; 15B.4.25; 15B.4.26.</p> <p>Ravensdown supports these amendments as they are considered to provide clarity and certainty to the policies, guidance the council staff and decision makers, and assists to achieve the outcomes sought by PC 5.</p>

Forest and Bird NZ	1895	Policy 15B.4.16	Oppose	<p>The submitter seeks the retention of Policy 15B.4.16 and an amendment to include:</p> <p><u>Resource consents will include conditions setting out:</u></p> <p><u>a) water quality monitoring sites including requirements for visual monitoring if appropriate</u></p> <p><u>b) Methods to avoid remedy or mitigate localised other effects</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Forest and Bird NZ	1899	Policy 15B.4.20	Oppose	<p>The submitter seeks an amendment to Policy 15B.4.20 as follows:</p> <p>15B.4.20 Freshwater quality is maintained in the Upper Waitaki Freshwater Management Unit by:</p> <p><del>(a) restricting increases in nitrogen losses from farming activities in the Haldon Zone or Mid Catchment Zone to a limit not exceeding the Upper Waitaki Nitrogen Headroom; and</del></p> <p>(b) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the <del>Ahuriri Zone or Upper Waitaki Hill Zone-Haldon Zone and Mid Catchment Zone</del> to exceed the Baseline GMP Loss Rate, <del>except where Policy 15B.4.13 applies;</del></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	2172	Section 15B.5 - Rules	Support	<p>The submitter seeks a new discretionary activity rule for farming enterprises [that uses the terms 'Loss Rate Assessed as Good Management Practice' and 'Loss Rate Assessed as Baseline GMP'] to provide an alternative consent pathway to the Farm Portal [see original submission for details].</p> <p>AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought</p> <p>Ravensdown supports this request as it is consistent with its own submission, and is considered to represent sound resource management practice.</p>



Nga Rūnanga and Te Rūnanga O Ngāi Tahu	920	Rule 15B.5.7	Oppose	<p>The submitter seeks an amendment to Rule 15B.5.7 to include an additional matter of control as follows:</p> <p><u>1. The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx; [see additional policies requested in PC5LWRP-877]</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Director General of Conservation	1653	Rule 15B.5.7	Oppose	<p>The submitter seeks an amendment to Rule 15B.5.7 as follows:</p> <p>Change the activity status to restricted discretionary activity;</p> <p>AND</p> <p>Add the following additional matters of control:</p> <p><u>“1. Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and</u></p> <p><u>2. Methods to protect significant indigenous freshwater biodiversity and habitat</u></p> <p>Ravensdown opposes the amendments requested as they are overly onerous, inappropriate and unnecessary. The amendments are not considered to have planning merit, and do not represent sound resource management practice.</p>
Fonterra Co-operative Group Ltd & Others	2149; 2167; 2152; 2168	Rule 15B.5.27; 15B.5.36; 15B.5.41; 15B.5.46	Support	<p>The submitter seeks an amendment to Rules 15B.5.27; 15B.5.36; 15B.5.41; 15B.5.46 so that the use of land for a farming activity as part of a farming enterprise is a controlled-activity, with control reserved over the following matters:</p> <p><u>1. The commencement date for the first audit of the Farm Environment Plan; and</u></p> <p><u>2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and</u></p> <p><u>3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and</u></p> <p><u>4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and</u></p>

				<p><u>5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate not exceeding the Baseline GMP Loss Rate; and</u></p> <p><u>6. Methods that require the farming enterprise to operate at or below the Good Management Practice Loss Rate, in any circumstance where that Good Management Practice Loss Rate is less than the Baseline GMP Loss Rate; and</u></p> <p><u>7. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and</u></p> <p><u>8. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits;</u></p> <p><u>9. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and</u></p> <p><u>10. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan.</u></p> <p>Ravensdown supports this request as it provide clarity to the council staff and decision makers, and assists to implement the policies introduced by PC 5.</p>
Fertiliser Association of New Zealand	Entire submission	[see submission points on specific PC 5 provisions]	Support	<p>Ravensdown supports the matters raised by the submitter as they are consistent with its own submission points, the relief sought are necessary and appropriate and assist to meet the purpose of the RMA, and represent sound resource management practice.</p>
Ballance Agri-Nutrients Limited	Entire submission	[see submission points on specific PC 5 provisions]	Support	<p>Ravensdown supports the matters raised by the submitter as they are consistent with its own submission points, the relief sought are necessary and appropriate and assist to meet the purpose of the RMA, and represent sound resource management practice.</p>