

**From:** [Chris Hansen](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Alex Adams](#); [Sarah Watson](#)  
**Subject:** Further submission to submissions to Proposed Plan Change 5 - Canterbury Land & Water Regional Plan  
**Date:** Friday, 13 May 2016 4:37:55 p.m.  
**Attachments:** [FINAL HWP Further Submission to Plan Change 5 to CLWRP 130516 .pdf](#)

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Please find attached a further submission on behalf of the Hurunui Water Project 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

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**Further Submission on Proposed Plan Change 5 to the  
Canterbury Land & Water Regional Plan**

(Closing date: 5pm on Friday 13 May 2016)

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

Name of Further Submitter: Hurunui Water Project Limited (HWP)

Address for Service: Duncan Cotterill  
P.O. Box 5  
Christchurch  
Attention: Sarah Watson  
  
Phone: (03) 379 2430  
Email: s.watson@duncancotterill.com

A detailed further submission is attached that identifies the name and ID number of the original submitter; the particular points of the submission this further submission relates to; the reason for support/opposition; whether whole or part of the submission is sought to be allowed/disallowed.

HWP has an interest in the proposal that is greater than the interest the general public has.

HWP could not gain an advantage in trade competition through making this submission

HWP **do** wish to be heard in support of our further submission.

If others make a similar submission, HWP **would** be prepared to consider presenting a joint case with them at any hearing.



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*Signature of person authorised to sign on behalf of the Hurunui Water Project.*  
**13 May 2016**

.....  
Date

<b>Submitter Name/Number</b>	<b>Submitter Point No.</b>	<b>Plan Provision</b>	<b>Support/ Oppose</b>	<b>Reason/Relief</b>
Hunter Downs Development Company Limited	63; 141	Definition of 'Farm Portal', Schedule 28, and all provisions that rely on the farm portal.	Support	The submitter considers that if Baseline GMP Loss Rates and Good Management Practice Loss Rates are to apply, they need to apply to the extent that they assume irrigation and irrigated land use. HWP supports this suggested approach as it represents sound resource management practice.
Hunter Downs Development Company Limited	67	"Baseline GMP Loss Rate"	Support	The submitter seeks an amendment to the definition of 'Baseline GMP Loss Rate' to ensure the definition does not apply directly to the management of irrigation schemes. [Note: refer to PC5 LWRP122 - submitter seeks irrigation schemes continue to be consented through Rule 5.41A, and 5.60 to 5.62]. HWP agrees with this request as it considers the submitter is correct in its interpretation of the L&WRP rules and the amendment is necessary to the definition to clarify this point.
Hunter Downs Development Company Limited	63	"Farm Portal"	Support	The submitter considers that the Farm Portal must provide accurate an appropriate modelling outputs that accommodate properties converting to irrigation. HWP supports this requirement, and understands there is concern that the Farm Portal is not accurate and the use of this approach may have implications for some farmers. HWP considers these matters need to be addressed.
Hunter Downs Development Company Limited	86	"Nitrogen Baseline"	Support	The submitter seeks additional matters be added to the definition of 'nitrogen baseline' referring to irrigation schemes. HWP agrees that if the Baseline GMP Loss Rate does apply to irrigation schemes, further amendment is required to address the conversion of dryland properties to irrigation.
Hunter Downs Development Company Limited	89	Policy 4.11	Support	The submitter seeks for Policy 4.11 to either be deleted, or if retained, amended to include effective review conditions that should be relied upon to achieve specific catchment water quality and quantity outcomes. HWP supports either deleting the policy, or if it is retained, amended as requested. The amendment is considered to represent sound resource

				management practice.
Hunter Downs Development Company Limited	91; 93; 94; 95; 96; 97; 98; 99	Policy 4.37 to Policy 4.38E	Support	The submitter seeks an explanation be added that clarifies that Policies 4.37 to 4.38E only apply to individual farming activities and farm enterprises, and not irrigation schemes. HWP agrees that an explanatory note is required to make it clear that policies 4.37 to 4.38E do not apply to irrigation schemes.
Hunter Downs Development Company Limited	120	Policy 4.41D	Support	The submitter seeks amendments to Policy 4.41D that provide greater clarity as to how the nutrients are to be accounted for and will reduce the uncertainty in this area. HWP supports the request and considers this clarity is important to provide guidance to council staff and decision makers.
Hunter Downs Development Company Limited	138	Schedule 7	Support	The submitter seeks an amendment to Schedule 7 that provides an alternative approach to be taken to the management of nutrient under consents granted to irrigation schemes. HWP agrees with this request as it is considered appropriate and necessary. Otherwise, the pathway for dryland properties to move to irrigation may be severely limited.
Hunter Downs Development Company Limited	141	Schedule 28 (and the Farm Portal)	Support	The submitter seeks an amendment to the explanation to Schedule 28 to address the intent of the proxies and to address a real concern that the errors within the proxies/inputs for the farm portal are flawed and that it needs further work to ensure it is accurate and reflects Good Management Practices. HWP supports the intent of the amended explanation and agrees with the concerns raised.
Hoban J K W and Others	2230; 2833; 2834; 2835; 2836; 2837; 2838; 2841; 2850; 2857; 2860; 2861; 2862; 2863; 2864; 2865; 2866; 2867	Policy 4.34, 4.36 to 4.41D	Support	The submitter seeks an amendment to the policies to recognise what is causing the water quality issues and to identify a catchment solution is required. HWP agrees with the request to have this recognition, and that the policies need to provide flexibility to address these matters.
Hoban J K W and Others	2249; 2251; 2253	Winter grazing – Rules 5.44A(4); 5.54A(3) and 5.57B(3)	Support	The submitter seeks recognition that it isn't simply the area which influences nitrogen loss, but also how it is used. HWP agrees with this point, and the amendment sought by the submitter

				to the rules.
Hoban J K W and Others	2278	Maps showing High Sediment and Phosphorus Risk Areas	Support	The submitter seeks deletion of High Sediment and Phosphorus Risk Areas, and to deal with this issue through a catchment solution. HWP supports the request of the submitter and sees the need for a catchment solution as necessary and consistent with good management practices.
Amuri Irrigation Company Limited	943	Induction and extent of PC5	Support	The submitter considers that specific reference is needed via a footnote or similar reference to the fact that PC5 policies and rules do not apply to the Hurunui, Waiau, and Jed River catchments which are managed by the Hurunui and Waiau River Regional Plan. HWP agrees that this clarification is required to provide certainty to the plan reader and to ensure the HWRRP provisions are retained separate to the PC 5 provisions.
Amuri Irrigation Company Limited	947	High Runoff Risk Phosphorus Zones	Support	The submitter seeks the deletion of the High Runoff Risk Phosphorus Zones within maps which are covered by the HWRRP. HWP agrees with this request as it considers this area is already covered by the HWRRP and the PC 5 provisions should not cover this area.
Amuri Irrigation Company Limited	963	The Farm Portal mechanism	Support	The submitter seeks a review of the detail of the Farm Portal system. HWP supports this request, and considers there is sufficient concern and uncertainty regarding the accuracy and usefulness of the Farm Portal mechanism to warrant a review.
Amuri Irrigation Company Limited	947	Policy 4.11	Support	The submitter seeks the deletion of Policy 4.11. HWP agrees with the request and considers Policy 4.11 is unnecessary and inappropriate.
Amuri Irrigation Company Limited	1008	Policy 4.41C	Support	The submitter seeks a new clause be added to the policy that allows an irrigation scheme to continue to manage their water on an aggregated basis. HWP supports the request and considers the amendment is necessary and appropriate, and represent sound resource management planning.