IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Environment Canterbury (Temporary Commissioners and Improved Water Management) Act 2010

AND

IN THE MATTER of proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

REPORT AND RECOMMENDATIONS

OF THE

HEARING COMMISSIONERS

APPENDIX A

Proposed Plan Change 5

Recommendations on Submissions

Hearing Commissioners:
David F Sheppard
Rob van Voorthuysen
Edward Ellison

In addition to the 129 primary submissions raising the points listed in this schedule, the CRC received 35 further submissions in support of, or opposition to, primary submission. To the extent that the points raised by further submissions are not identified directly in this schedule, we recommend that they are accepted or rejected according to our recommendations for accepting or rejecting the corresponding submission points.

References within this table to reasons and recommendations within the Section 42A Report refer to information contained in the initial Section 42A Report, the Section 42A Reply Report, and answers to questions posed at the hearing.

General submissions

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
Submissions in general support				
PC5LWRP-1051	New Zealand Defence Force	Supports Plan Change 5 in its entirety.	Accept in part	We acknowledge the general support by these submitters for Plan Change 5 but note that no specific decision is requested.
PC5LWRP-1091	North Canterbury Fish and Game & SI Fish and Game	Support PC5 in its entirety except where further or alternative relief is sought.		
PC5LWRP-1719	Ravensdown Limited	Support the general intent of Plan Change 5.		
PC5LWRP-381	Waimate District Council	Submitter supports the general intent of PC5.		
PC5LWRP-1465	Hodder W D	Supports PC5 as a small step to improving water quality.		
PC5LWRP-2665	Forest and Bird NZ	Submitter generally supports the water quality goals in PC5.		
PC5LWRP-427	Gloag T	Submitter supports the use of nutrient management controls but requests that the plan change goes further to protect water and habitats.		
PC5LWRP-1099	White K A	Supports PC5 requirements for farmers to farm to good management practices.		
Submissions in general opposition				
PC5LWRP-1818	Lower Waitaki River Management Soc Inc	Submitter opposes PC5 stating that the plan change is focused on the short term and facilitating immediate economic return from intensive industrial agricultural systems. Submitter requests focus is instead placed on achieving farm systems that are ecologically stable and robust because they are not heavily dependent on high inputs or polluting discharge.	Reject	No particular decision is specifically requested.
PC5LWRP-1095	Hayes A	Submitter opposes PC5 in its entirety as it will not improve or maintain water quality.		
PC5LWRP-517	MFS Ventures Ltd C/- Greg Nelson	Submitter is concerned about the proposed prohibition on any type of development as it would have implications for future economic viability of community.		
Submissions requesting simplification of provisions				
PC5LWRP-1762	Glenmac Farm	Submitter is opposed to the overall complexity of the plan change and requests simplification.	Accept in part	These submission points request simplification of the provisions in Plan Change 5. We agree, for the reasons set out in the Section 42A Report, that some amendments to the provisions in Part B of Plan Change 5 are appropriate to remove duplication and improve understanding of the plan change.
PC5LWRP-1742A	Lower Waitaki River Management Soc Inc	Submitter opposes the complexity of nutrient management under the proposed objectives, policies, rules and methods requests simplification.		
PC5LWRP-18	Donald McKenzie	Submitter states that PC5 is overly complicated and difficult to understand and unenforceable.		
PC5LWRP-2074	Moir Farms Maimai Limited	Submitter states that if the rules were simpler, all parties (farmers, District Councils and ECAN) could work together.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1263A	Hurst M J F	Amend PC5 to clarify and simplify the proposed plan change.		
PC5LWRP-1178A	Arnstead Organic Farm	Simplify the plan so that it can be understood by farmers.		
PC5LWRP-1146A	Burke G J	Amend to ensure a simpler, easier, enforceable and auditable system that can be understood and implemented without complication or bureaucracy.		
PC5LWRP-1363	Mackenzie Irrigation Company Ltd	Amend PC5 to achieve greater understanding among farmers so that they can determine where their property fits in, and also to make sure that all parts of the plan are enforceable.		
PC5LWRP-1669	Phillips N and S	Amend PC5 to achieve a plan that it is able to be understood by farmers so that they can determine where their property fits in and that all parts are workable and enforceable.		
PC5LWRP-2700	Omarama Stream Water Users Group	Amend PC5 to achieve a plan that is workable and enforceable.		
PC5LWRP-2049	Moir Farms Maimai Limited	Amend PC5 to achieve provisions that are straightforward enough for individuals to apply for consent independent of the need for a consultant.		
General submissions relating to water quality limits and standards				
PC5LWRP-1770B	Lower Waitaki River Management Soc Inc	Amend PC5 to include policies and rules which contain real measureable limits and bottom lines.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1803	Lower Waitaki River Management Soc Inc	Amend PC5 to include policies and rules which contain real measureable limits and bottom lines.		
PC5LWRP-1750	Lower Waitaki River Management Soc Inc	The submitter requests the inclusion of water quality limits that incorporate sufficient precaution and redundancy to accommodate shorter term variations in the likes of temperature and oxygen to safeguard the life supporting capacity of water.		
PC5LWRP-1812	Lower Waitaki River Management Soc Inc	Submitter states that nitrogen limits and loading rates are too high to be confident that national and regional freshwater objectives are going to be met.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-597	Marshall C J	Amend PC5 to include provisions setting a water quality standard for rivers that ensures water quality is safe for swimming in summer, including during periods of low flow.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-1742	Lower Waitaki River Management Soc Inc	Amend PC5 to include water quality limits that incorporate sufficient precaution and redundancy to accommodate short term fluctuations in oxygen and temperature and that reduce the risk of over-allocation.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1770A	Lower Waitaki River Management Soc Inc	Submitter seeks clarification that reliance on GMP will maintain or improve freshwater quality.	Reject	A general request which does not give precise details of amendments requested.
Submissions requesting additional consultation				
PC5LWRP-739	Johnston R H M	Submitter opposes the Plan Change on the basis that insufficient time was given between notification and closing of submissions and the method by which people were notified.	Reject	This submission point does not request a specific amendment to plan change and is therefore outside the scope of Plan Change 5. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-1303	Benmore Station	Submitter requests consultation on the specific OVERSEER® loss rate numbers in the Plan so that users of the Plan have a clear understanding of their legal effect and the basis for calculation.		
PC5LWRP-1208	West Edge	Submitter requests consultation on the specific OVERSEER® loss rate numbers in the Plan so that users of the Plan have a clear understanding of their legal effect and the basis for calculation.		
PC5LWRP-1235	Benmore Irrigation Company Ltd - Shepherd	Submitter requests consultation on the specific OVERSEER® loss rate numbers in the Plan so that users of the Plan have a clear understanding of their legal effect and the basis for calculation.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	B			
PC5LWRP-1258	Twizel Dairy	Submitter requests consultation on the specific OVERSEER® loss rate numbers in the Plan so that users of the Plan have a clear understanding of their legal effect and the basis for calculation.		
PC5LWRP-1296A	Ellis-Lea Farm	Submitter requests consultation on the specific OVERSEER® loss rate numbers in the Plan so that users of the Plan have a clear understanding of their legal effect and the basis for calculation.		
PC5LWRP-1543A	Horticulture New Zealand	Provide an opportunity for consultation and submission on which documents should be incorporated into the Plan Change.		
Submissions relating to resource consent requirements for existing farming activities				
PC5LWRP-1098	White K A	Amend PC5 so that resource consent is not required for farmers carrying on farming as they currently are.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1365	Pukaki Tourism Holdings LP	Amend PC5 to change the requirements in relation to resource consents to prevent an additional layer of consenting and to make the plan able to be understood by farmers so that they can determine where their property fits in.		
PC5LWRP-1146	Burke G J	Amend to ensure that further consents are not required to continue operating as they are.		
Submissions requesting less regulation of farming activities				
PC5LWRP-1405	Johnson B and D	Submitter considers the Farm Portal to be expensive and time consuming, and doesn't want lifestyle farms to be grouped and regulated the same as large, intensive farms.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2232	Sloss K	Amend plan to achieve a reduction in the amount of bureaucracy required for farms as permitted activities from that in the plan.		
PC5LWRP-1316	Chisnall W G S	Amend PC5 to achieve a reduction in the cost of compliance with the plan.		
PC5LWRP-249M	DairyNZ	Amend PC5 to consider the cost and capacity implications of the consenting requirements, both in terms of the ability of Council resources to deliver the consenting obligations in a timely manner, and in terms of the impact on farmers (monetary and time costs).		
PC5LWRP-1762C	Glenmac Farm	Submitter seeks reinstatement of the operative LWRP green zone rules for the submitter's property.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See also the separate narrative on this point in the main text of this report.
PC5LWRP-722	Johnston R H M	Submitter opposes increased auditing requirements for Orange, Green and Blue Zone Allocation Zone Rules.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-249M	DairyNZ	Submitter requests more planning flexibility in the permitted activity rules within the Green and Light Blue Nutrient Allocation Zones.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See also the separate narrative on this point in the main text of this report.
PC5LWRP-1096	Hayes A	Amend PC5 to ensure the use of OVERSEER® and the Farm Portal is only used for high nutrient emitters.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
Submissions requesting a review of the Section 32 analysis				
PC5LWRP-1723	Ravensdown Limited	Undertake a more thorough and robust evaluation of the costs and benefits of: a) adopting and implementing the proxy numbers in the Farm Portal;	Reject	We are satisfied that the Section 32 Report meets the requirements of the Resource Management Act 1991.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		b) an alternative pathway regardless of whether the Farm Portal is 'fixed'; and c) adopting prohibited activity status for certain activities.		
PC5LWRP-1738	Lower Waitaki River Management Soc Inc	The submitter states the process for setting water quality outcomes and limits as set out (in Section 32), relies heavily on what values the "community" puts on that unit.	Reject	No specific decision requested.
Submissions requesting the ability to review nutrient limits during the development of sub-region sections of the Plan				
PC5LWRP-724E	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain the provisions as proposed, provided they do not limit the ability for existing plan changes and any future plan changes within Zones to introduce nutrient caps or permitted activity baselines for nutrient loss and measures that facilitate staged reduction in nutrient losses.	Accept in part	Provisions in Plan Change 5 already address these matters.
Submissions requesting an alternative method to allocation of nutrients to farming activities				
PC5LWRP-1178B	Arnstead Organic Farm	Submitter considers the Plan is inequitable as it is a 'grandfathering' plan and does not allow low emitters to increase their nitrogen loss. Submitter asks for a plan that is closer to a 'modified equal allocation' model or 'land use capability' model.	Reject	We are not persuaded that the alternative nutrient management regime requested by the submitter would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-381A	Waimate District Council	Submitter request amendments to the Plan Change to make it equitable for all farmers (whether they currently have intensive farming or not).		
PC5LWRP-2275	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Submitter supports Beef and Lamb NZ position that provisions that 'grandparent' historic nitrogen losses should be removed and requests provisions that treat low leaching farms differently to high leaching farms.		
PC5LWRP-1762A	Glenmac Farm	Submitter requests the use of an equal allocation model to allocate nutrient losses to farming activities.		
PC5LWRP-249C	DairyNZ	Retain provisions that address equity issues associated with the nitrogen baseline and which avoid 'windfall gains'.		
PC5LWRP-1770	Lower Waitaki River Management Soc Inc	Submitter requests the nutrient loss rates are linked to the target outcomes so if they are not met then the loss rates can be revised without 'derogation of right' issues.		
PC5LWRP-1762B	Glenmac Farm	Submitter states that controls should be focused on the 'worst offenders'.		
Submissions relating to the use of the Phosphorus Risk Maps				
PC5LWRP-54	Munro A R and K H	Submitter requests the removal of the inaccurately mapped Phosphorus Zone as science used to prepare them is not robust science and the provisions place an unfair burden on landowners.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
Submissions requesting the use of a Catchment Board Model				
PC5LWRP-2488	Holland D G	Amend PC5 to implement a Catchment Board Model.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See also Chapter 6 of this report.
PC5LWRP-2512	Anderson D & K and Anderson B & M	Amend PC5 to implement a Catchment Board Model.		
PC5LWRP-2543	Munro A R and K H	Amend PC5 to implement a Catchment Board Model.		
PC5LWRP-1435	Hurunui SNA Group & Rural Advocacy	Amend all policies and rules as necessary to implement a catchment board model, similar to Taranaki.		
Submissions relating to good management practice or Farm Environment Plan requirements				

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1303B	Benmore Station	Retain the concept of GMPs.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1296	Ellis-Lea Farm	Retain the concept of GMPs.		
PC5LWRP-249A	DairyNZ	Retain good management practice so as to maintain or improve freshwater quality.		
PC5LWRP-724D	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain the amendments that enable Good Management Practice to provide for improvement in water quality.		
PC5LWRP-249J	DairyNZ	Ensure industry-defined GMPs form the basis for implementation of the Land and Water Regional Plan.		
PC5LWRP-2761A	Federated Farmers of New Zealand	Require permitted activities to operate at good management practice as defined in the document 'Industry-agreed Good Management Practices relating to water quality'.		
PC5LWRP-1598	Banks J and T	Retain requirements for all farming activities to use the industry agreed Good Management Practices or other appropriate farm management programmes to minimise the risk of nitrogen, phosphorus or sediment losses to water.		
PC5LWRP-249B	DairyNZ	Retain the focus in the Plan on the use of Industry Defined Good Management Practices (GMPs), and the use of Management Plans and Farm Environment Plans as the means to implementing these.		
PC5LWRP-18	Donald McKenzie	Submitter considers that farmers should operate under FEPs and abide by GMP, with no requirement to obtain a resource consent.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. See also Chapter 14 of this report.
PC5LWRP-724C	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain the requirement for Farm Environment Plans and Management Plans to be prepared, implemented and audited.		
PC5LWRP-1263A	Hurst M J F	Amend PC5 to include more reliance on practical measures to achieve GMP as part of FEPs.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-983	Auchenbrae Farm Limited	Amend PC5 to ensure GMP is transparent.		
PC5LWRP-2721	Amuri Dairying Ltd	Amend PC5 to ensure GMP is transparent.		
PC5LWRP-2723	Neill S	Amend PC5 to ensure GMP is transparent.		
PC5LWRP-2764	Lissington S, L, B and J	Amend PC5 to ensure the GMPs are transparent.		
PC5LWRP-2776	Hillcrest Farm	Amend PC5 to ensure the GMPs are transparent.		
PC5LWRP-2672	Nutrient Solutions Ltd	Submitter suggests it would be preferable to focus on farm environment plans and education, rather than nitrogen baselines.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2690	Killermont Station 2012 Limited	Amend PC5 so GMP is based on actual on-farm practices and incorporated into Farm Environment Plans. Better define GMP in the Plan.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2649A	Murphy B	Amend to provide for self audited self managed Farm Environment Plans and Good Management	Reject	The amendments requested would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Practice.		provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See also Chapter 6 of this report.
PC5LWRP-46	Benmore Irrigation Company Ltd - Shepherd	Amend PC5 to provide greater specificity as to what farmers need to undertake now to meet GMP requirements now.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1296B	Ellis-Lea Farm	Amend PC5 to provide greater specificity as to what farmers need to undertake now to meet GMP requirements now.		
PC5LWRP-1258A	Twizel Dairy	Amend PC5 to provide greater specificity as to what farmers need to undertake now to meet GMP requirements now.		
PC5LWRP-1208A	West Edge	Amend plan to provide practical guidelines of how GMP is to be applied in practice and to set out what farmers need to undertake now to meet GMP requirements.		
PC5LWRP-1363B	Mackenzie Irrigation Company Ltd	Ensure GMP practices are better defined in the plan so that the expectations of farmers are clear.		
PC5LWRP-1267A	Haldon Station Limited	Amend the plan to better define GMP.		
PC5LWRP-2681A	Twinburn Ltd	Amend the plan to better define GMP.		
PC5LWRP-2707	Rietveld J A	Amend the plan to better define GMP.		
PC5LWRP-2763A	Kakahu Catchment Group	Amend the plan to define GMP.		
PC5LWRP-1267	Haldon Station Limited	Ensure the GMPs are based on actual on-farm practice, appropriate for the Upper Waitaki Catchment and incorporate their use in Farm Environment Plans.		
PC5LWRP-2681	Twinburn Ltd	Ensure the GMPs are based on actual on-farm practice, appropriate for the Upper Waitaki Catchment and incorporate their use in Farm Environment Plans.		
PC5LWRP-2707	Rietveld J A	Ensure the GMPs are based on actual on-farm practice, appropriate for the Upper Waitaki Catchment and incorporate their use in Farm Environment Plans.		
PC5LWRP-51	Kokoamo Farms Limited	Amend PC5 to ensure GMPs appropriate to each catchment should be better defined in the plan changes.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-386	Hunter Downs Development Company Limited	Amend PC5 to ensure flexibility is retained to select on-farm good management practices that are tailored to the property and not overtly prescriptive.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2767	Kingsbury M	Define GMPs that are appropriate for specific catchments in PC5.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2768	Metherell G	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-2769	Gray J, R, B and H	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-2772	Cameron W N and S P	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-2773	Sutton R	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-2774	McFarlane A	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-2775	MFS Ventures Ltd C/-	Define GMPs that are appropriate for specific catchments in PC5.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Greg Nelson			
PC5LWRP-2786	Bellfield Land Co Ltd	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-2787	Craigmore Farming	Define GMPs that are appropriate for specific catchments in PC5.		
PC5LWRP-518	Central Plains Water Ltd	Amend PC5 to ensure flexibility is retained to select on-farm good management practices that are tailored to the property and not overtly prescriptive.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-249L	DairyNZ	Amend to ensure the overall planning approach provides for flexibility to reflect the changing nature of farming systems and benefits of innovation.	Accept	Provisions in Plan Change 5 already address these matters.
Submissions relating to provisions that rely on OVERSEER®				
PC5LWRP-249I	DairyNZ	Ensure the overall goal of regulation is to guide good decision making and good environmental management, within established environmental limits rather than a 'farming to a number' requirement.	Reject	These submission points request the omission of provisions that incorporate the OVERSEER® model or the Farm Portal as the method for estimating nitrogen losses from a farming activity (or in the case of the Farm Portal nitrogen losses under good management).
PC5LWRP-1435A	Hurunui SNA Group & Rural Advocacy	Submitter requests amendments to the plan change that reduce the reliance on the OVERSEER® model.		
PC5LWRP-6249	Waimakariri Irrigation Ltd	Submitter is concerned that PC5 moves away from an action based approach to a numbers-based approach that relies on OVERSEER® and Farm Portal numbers that do not reflect actual farming practice.		
PC5LWRP-249F	DairyNZ	Amend PC5 to acknowledge the limitations of the OVERSEER® model in regulation.	Accept in part	Provisions in Plan Change 5 already address these matters.
PC5LWRP-249H	DairyNZ	Amend PC5 to appropriately provide for OVERSEER® model version changes, and ensure that the requirements placed on plan users recognise these practical limitations and the potential for inaccuracies between what is modelled and what is happening on-farm.		
PC5LWRP-1146A	Burke G J	Require OVERSEER® and other computer models to be capable of a standard that produces loss rates without greater than a 5% error rate and require consistency in the entry of data by operators of the model.	Reject	Changes to the OVERSEER® model are outside the scope of Plan Change 5. Further we note that the LWRP already requires date to be entered into the OVERSEER® model in accordance with the OVERSEER Best Practice Data Input Standards.
PC5LWRP-700	Johnston R H M	Amend plan change to achieve a regulatory framework that is not reliant on OVERSEER®.	Reject	These submission points request the omission of provisions that incorporate the OVERSEER® model or the Farm Portal as the method for estimating nitrogen losses from a farming activity (or in the case of the Farm Portal nitrogen losses under good management practice). We consider the omission of these provisions would unjustifiably weaken the effectiveness of the plan change and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1216	Claremont Farms Ltd	Amend PC5 provisions to delete OVERSEER® requirements.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1195	Neal K B	Amend Plan to achieve a reduction in reliance on OVERSEER®.		
PC5LWRP-33	Johnston R H M	Submitter states the reliance on OVERSEER® in plan provisions will result in unenforceable provisions particularly given the flaws in the model.	Reject	No specific decision is requested.
PC5LWRP-1263	Hurst M J F	Amend PC5 to achieve less emphasis on OVERSEER® numbers as a regulatory tool and more reliance	Reject	The amendments requested would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		on practical frameworks to be put in place around GMP as part of FEPs.		provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
Submissions relating to compliance with Baseline GMP Loss Rates and Good Management Practice Loss Rates				
PC5LWRP-724D	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain the use of a Good Management Practice Loss Rates as a tool to manage on-farm nutrient losses and achieve an overall cumulative reduction in nutrient loss, particularly within over-allocated catchments.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2050	Fonterra Co-operative Group Ltd	Amend PC5 policies, rules and associated definitions to remove the reliance on the Good Management Practice Loss Rates. OR 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. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1616	Banks J and T	Amend PC5 so that farmers are not confined to nitrogen baseline figures or GMP loss rate.		
PC5LWRP-2761	Federated Farmers of New Zealand	Amend to incorporate GMP Loss Rate within the FEP process rather than using it as the basis for granting consent.		
PC5LWRP-1363A	Mackenzie Irrigation Company Ltd	Amend PC5 to ensure GMP is about actual on-farm practice rather than the plan linking GMP to an OVERSEER® output number.	Reject	These submission points request the omission of provisions that incorporate the OVERSEER® model or the Farm Portal as the method for estimating nitrogen losses from a farming activity (or in the case of the Farm Portal nitrogen losses under good management practice). We consider the omission of these provisions would unjustifiably weaken the effectiveness of the Plan Change and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2763	Kakahu Catchment Group	Amend PC5 so GMP is based on actual on-farm practices rather than an OVERSEER® output number.		
PC5LWRP-2740	Orari Water Users Group	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® output number.		
PC5LWRP-2767	Kingsbury M	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® number.		
PC5LWRP-2768	Metherell G	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® number.		
PC5LWRP-2771	Spectrum Group	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® output number.		
PC5LWRP-2773	Sutton R	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® output number.		
PC5LWRP-2774	McFarlane A	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® output number.		
PC5LWRP-2775	MFS Ventures Ltd C/- Greg Nelson	Amend Good Management Practice to be about actual on-farm practice rather than an OVERSEER® output number.		
Submissions relating to the use of the Farm Portal				
General				
PC5LWRP-249G	DairyNZ	Retain the use of MGM (GMP narratives, Catchment Matrix and portal with GMP modelling proxies) as the best avenue for land users to reduce nutrient losses and for sub-regional planning	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		approaches.		
PC5LWRP-1079	Giles M	Retain Farm Portal and MGM as notified.		
PC5LWRP-769	Rangitata Dairies	Retain Farm Portal concept and its ongoing development.		
PC5LWRP-914	Orari Catchment Group	Retain Farm Portal concept and its ongoing development.		
PC5LWRP-811	Purata Farming Ltd	Delete reference in PC5 to the Farm Portal to allow refinement and adopt Industry Good Management Practices.	Reject	These submission points request the omission of provisions that incorporate the OVERSEER® model or the Farm Portal as the method for estimating nitrogen losses from a farming activity (or in the case of the Farm Portal nitrogen losses under good management practice). We consider the omission of these provisions would unjustifiably weaken the effectiveness of the plan change and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1439	Hurunui SNA Group & Rural Advocacy	Delete all references to the Farm Portal.		
PC5LWRP-250A	DairyNZ	Retain the Portal for collecting farm information for collation, environmental modelling and reporting, and farm decision making purposes.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1188	Waikakahi Farmers Group	Amend PC5 to continue with current FEP framework and use OVERSEER® and the Farm Portal as a guide.	Accept in part	We agree that retaining the use of FEPs in the PC5 framework is appropriate.
PC5LWRP-2051	van't Klooster G	Amend the Farm Portal to ensure it tested for 2 - 4 years and easy to use.	Reject	The request to require on-going testing of the Farm Portal is outside the scope of Plan Change 5.
PC5LWRP-2071	Moir Farms Maimai Limited	Amend to explain how the information in the Farm Portal will be used.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-2203	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend the Farm Portal to achieve better usability that is not onerous to farmers and ensure access is available to all.		
PC5LWRP-1937	Murchison JG and LM	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.	Reject	These submission points do not give precise details of the amendments sought to PC5.
PC5LWRP-2283	Sloss K	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2324	McLean G and M	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2345	Rangatahi Downs Land Trust	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2454	Forrester K	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2505	Holland D G	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2526	Anderson D & K and Anderson B & M	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2554	Maungatahi Farm Limited	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2563	Munro A R and K H	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-1683	Forrester J and R	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-2285	Hoban J K W	Submitter requests the Farm Portal to be used as an information tool for farmers and seeks an explanation as to how the information entered into the portal will be used and whether this information will be accessible in respect of the Local Government Official Information and Meetings Act 1987.		
PC5LWRP-1100	White K A	Retain the Farm Portal. However, OVERSEER® budgets should not be the only tool to manage water quality instead audited FEPs will produce good farming practices.	Accept in part	Provisions in Plan Change 5 already address these matters.
PC5LWRP-356	Dairy Holdings Limited	Amend the 'Farm Portal' to ensure the Farm Portal is used/structured in a manner that accommodates a dryland property converting to irrigation.	Accept in part	This submission point does not give precise details of the amendment requested. However we not the Farm Portal is configured in a way that it can estimate nutrient losses from dryland properties converting to irrigation.
PC5LWRP-688	Barrhill Chertsey Irrigation Scheme	Amend the 'Farm Portal' to ensure the Farm Portal is used/structured in a manner that accommodates a dryland property converting to irrigation.		
PC5LWRP-142	Barton N	Amend the Farm Portal to accommodate a dryland property converting to irrigation.		
Requirement to register with the Farm Portal				
PC5LWRP-250	DairyNZ	Retain the requirement for all properties over 10 ha to use the Portal and not for properties under 10 ha.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1600	Banks J and T	Remove the requirement from PC5 for farmers to register their farming activities on the new portal, without any information about how or by whom that information will be used, or will be accessible to under the Local Government Official Information and Meetings Act 1987.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1011	Banks B	Remove the requirement from PC5 for farmers to register their farming activities on the new portal, without any information about how or by whom that information will be used, or will be accessible to under the Local Government Official Information and Meetings Act 1987.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
Use of the Farm Portal for catchment accounting				
PC5LWRP-250	DairyNZ	Retain the use of the Portal for catchment accounting.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1432	Mackenzie Irrigation Company Ltd	Amend Farm Portal to reduce reliance on narratives which are used to create input rules in OVERSEER® and to achieve validation of GMP to give more confidence in the Farm Portal and the outputs it produces.	Reject	A general request which does not give precise details of amendments requested.
Submissions seeking a review of the Farm Portal or modelling proxies in Schedule 28.				
PC5LWRP-1145	Burke G J	Retain the Farm Portal subject to assumptions/models being proven including OVERSEER® error rates.	Accept in part	A general request which does not give precise details of amendments requested.
PC5LWRP-356A	Dairy Holdings Limited	Amend the 'Farm Portal' to correctly represent Schedule 28 and the proxies and to correct any other errors.	Accept in part	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
PC5LWRP-688A	Barrhill Chertsey Irrigation Scheme	Amend the 'Farm Portal' to correctly represent Schedule 28 and the proxies and to correct any other errors.		
PC5LWRP-2675	Mackenzie Irrigation Company Ltd	Amend the modelling proxies to ensure the MGM narrative used to determine the input rules in OVERSEER® are robust and reflect actual farming systems.		
PC5LWRP-250A	DairyNZ	Amend the proxies within the portal to ensure the proxies are not inconsistent, technically flawed and not validated.		
PC5LWRP-769A	Rangitata Dairies	Clarify all the proxies used in the modelling of the GMP loss rate through the farm portal.		
PC5LWRP-914A	Orari Catchment Group	Clarify all the proxies used in the modelling of the GMP loss rate through the Farm Portal.		
PC5LWRP-966	Ballance Agri-Nutrients Limited	The submitter makes the following requests in relation to the Farm Portal • An independent review of the Farm Portal modelling proxies in relation to Good Management Practice. This independent peer review will need to be carried out by an appropriately qualified and experienced independent expert in nutrient modelling and one that is able to consider the implications of the Farm Portal when applied to the regional planning context within which the model is proposed to be applied. Any outcome of the review would see the correction of any flaws, if possible, within the modelling proxies, such that they relate to, and are aligned with 'Good Management Practice'. • The outcome of the peer review and the proposed solution should be shared with all submitters to this aspect of PC5 (including any changes to both policy and rule framework linked to the same) at least six weeks in advance of further submissions period • Until the issues with the Farm Portal have been addressed, council retain the drafting gate function of the Farm Portal in regard to the need for resource consent, and that any subsequent consents reflect the narrative Good Management Practices recommended by industry and adopted by council. • That PC5 should not be advanced further until the plan change sought above has been publicly notified and the submission period closed.	Reject	A number of submissions sought an independent review of the modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We note the modelling proxies were developed with input from representatives from a range of farming sectors and subject to additional analysis through the hearing process. We are therefore satisfied that an additional review process is neither appropriate nor necessary.
PC5LWRP-250C	DairyNZ	Amend PC5 to include commitment and undertaking of a validation process which: • Seeks to meet measures of success that are pre-defined and pre-agreed between CRC and industry bodies. • Assesses the individual proxies to ascertain the extent of any errors or variances, for each proxy. • Once each proxy has been assessed individually, a reassessment of the proxies collectively		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		is undertaken to ascertain the extent of any errors or variances across different farm types. • Investigate alternative approaches to GMP including, for example, putting a maximum cap on N-fertiliser use (i.e. no winter N and maximum monthly applications of 50 kg/ha) and reducing N surplus thereby reducing N leaching from Dairy farms.		
PC5LWRP-963	Amuri Irrigation Co Limited	Amend PC5 on the basis of a further peer review of information as follows: commission an independent peer review of the Farm Portal and the modelling rules in Schedule 28, and make the report available to all submitters; and 1) if the review finds the Farm Portal accords with the modelling rules in Schedule 28; a) amend the Farm Portal and Schedule 28 to ensure that losses required to achieve GMP do not unacceptably constrain farming activity and cause unacceptable social and economic effects; and b) insert timeframes in the plan provisions so there are no unacceptable social and economic consequences to achieve GMP and if necessary to provide for the inclusion of timeframes, make amendments to the definitions of "Baseline GMP Loss Rate" and "Good Management Practice Loss Rate" so the definitions include timeframes for the achievement of GMP. OR; 2) If the review finds the Farm Portal does not accord with the modelling rules in Schedule 28, amend and test the Farm Portal to ensure it gives effect to the modelling rules and the rules accurately interpret the narrative GMP, and the GMP losses not unacceptably constrain farming activity and cause unacceptable social and economic effects. 3) If the revised version of the Farm Portal does; a) not cause unacceptable effects, no further amendments are required, or b) cause unacceptable effects, amend as follows in (1) above; AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-485	Rangitata Diversion Race Management Limited	Amend 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. AND 1) If the review finds the Farm Portal accords with the modelling rules in Schedule 28 and the modelling rules accurately interpret the narrative GMP: then a) amend the Farm Portal and Schedule 28 to ensure that losses required to achieve GMP do not unacceptably constrain farming activity and cause unacceptable social and economic effects; and b) insert timeframes in the plan provisions so there are no unacceptable social and economic consequences to achieve GMP AND; if necessary to provide for the inclusion of timeframes, make amendments to the definitions of "Baseline GMP Loss Rate" and "Good Management Practice Loss Rate" so the definitions include timeframes for the achievement of GMP. OR; 2) If the review finds the Farm Portal does not accord with the modelling rules in Schedule 28 or the modelling rules do not accurately interpret the narrative GMP, then: a) amend and test the Farm Portal to ensure it gives effect to the modelling rules and the rules accurately interpret the narrative GMP, and the GMP losses not unacceptably constrain farming activity and cause unacceptable social and economic effects; and should the trialling of the revised version of the Farm Portal produce outcomes that do not unacceptably effect the social and economic wellbeing of Canterbury, no further amendments are required; not cause unacceptable effects, no further amendments are required, and b) should the trialling of the revised version of the Farm Portal produce outcomes that unacceptably effect the social and economic wellbeing, amend as per 1). And make any similar and/or consequential amendments that stem from the changes and/or additions.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2719	Ravensdown Limited	Place PC5 on hold until the issues with modelling the rules are addressed. AND Amend rules to provide an alternative consenting pathway for farm users who do not have confidence in the Farm Portal proxy numbers; and for those farm systems that cannot be modelled. AND Amend PC5 to provide an additional formal process for reviewing and moderating inaccurate portal results. AND Place PC 5 on hold until a sensitivity analysis on the impact of the GMP in the Farm Portal nutrient report can be undertaken, with modifications to the reporting to provide clear directions to the farm user how GMP can be achieved. AND Address the robustness of the GMP nitrogen loss value in the Farm Portal, and provide a clear statement or disclaimer regarding the accuracy and robustness of the GMP estimates, once the Farm Portal is 'fixed'. AND Amend PC5 to embed the GMP Loss Rate within the FEP process, rather than using this as a basis for granting a consent. Such other or alternative wording for the provisions that would properly address the concerns raised in this submission.	Accept in part	This submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-2425A	Federated Farmers of New Zealand	Amend PC5 to include a formal process for reviewing and moderating the Farm Portal.	Reject	The submission is outside the scope of the Plan Change. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-867	Fertiliser Association of New Zealand	The submitter seeks a long term solution for robust modelling rules of the Farm Portal, in particular fertiliser modelling rules. Regardless of modelling rules amend policies and rules such that exceedance of baseline GMP Loss rate results in restricted discretionary or discretionary consent and not a prohibited activity status.	Reject	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
Irrigation Schemes and the Farm Portal				
PC5LWRP-63A	Hunter Downs Development Company Limited	The submitter requests that the requirement to comply with nutrient loss rates in the 'Farm Portal' is not a requirement for properties receiving water from an irrigation scheme where the irrigation scheme is required to account for nutrient losses.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-516A	Central Plains Water Ltd	The submitter requests that the requirement to comply with nutrient loss rates in the 'Farm Portal' is not a requirement for properties receiving water from an irrigation scheme where the irrigation scheme is required to account for nutrient losses.		
PC5LWRP-968	Johnston R H M	Submitter opposes the introduction of the LWRP over the NRRP which was 98% complete and considers the LWRP to not be any further forward (left wanting on so many fronts).	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-688A	Barrhill Chertsey Irrigation Scheme	The submitter seeks that the Farm Portal should not be a requirement in respect of a resource consent granted to a developing irrigation scheme, but rather a reference guide within Schedule 7 and monitored through the FEP audits. The submitter is concerned that the Section 32 analysis doesn't appropriately consider the costs associated with the Farm Portal.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
Submissions relating to updating of the modelling proxies in Schedule 28				
PC5LWRP-2726	Dairy Holdings Limited	Include a mechanism in Plan Change 5 to require the Council to review and if necessary to update proxies/inputs that underpin the Farm Portal (by way of plan change in the case of material amendments).	Reject	The request to require a mechanism to update the modelling proxies is outside the scope of Plan Change 5. See Chapter 7 of this report.
PC5LWRP-1851	Fonterra Co-operative Group Ltd	Retain 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.	Accept in part	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
Submissions requesting an alternative consent path to the Farm Portal				
PC5LWRP-518A	Central Plains Water Ltd	The submitter seeks an alternative consenting pathway that does not rely on the outputs of the Farm Portal.	Accept	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1147	Fertiliser Association of New Zealand	Amend the Farm Portal so that in the interim an alternative is provided, and more satisfactory and robust modelling rules for determining GMP loss values are available for the long-term.		
PC5LWRP-1851A	Fonterra Co-operative Group Ltd	Provide an alternative pathway for considering consent applications for farming activities to farm at GMP that does not rely on the Farm Portal.		
PC5LWRP-966A	Ballance Agri-Nutrients Limited	Amend PC5 to provide an alternative pathway for those farm systems not able to be fully assessed by the Farm Portal.		
PC5LWRP-2649B	Murphy B	Amend to provide for self audited self managed Farm Environment Plans and Good Management Practice.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-250B	DairyNZ	Amend PC5 to include: • An alternative consenting pathway in addition to that provided by the portal. • 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.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-375	Dairy Holdings Limited	Amend Plan Change 5 to provide an alternative consenting pathway for those that consider the Farm Portal is not reflective/accurate in respect to their farming activity.		
PC5LWRP-1425	Fertiliser Association of New Zealand	Amend PC5 to provide an alternate pathway for circumstances where the farm system cannot be addressed by the Farm Portal.		
PC5LWRP-2425	Federated Farmers of New Zealand	Amend PC5 to include an alternative consenting pathway, in addition to that provided by the Farm Portal.		
Submissions relating to the appropriateness of the Farm Portal for some types of farming activity				
PC5LWRP-2541	Munro A R and K H	Submitter challenges the use of the farm portal and management plan requirements for coastal areas of Omihi, Motunau and Conway.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-645	Lee D	Amend PC5 to only require dairy, sheep, cattle, horse and deer farming to register with the Farm		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Portal.		
PC5LWRP-2778A	Egg Producers Federation and Poultry Industry Association	Exclude poultry from the nutrient management policies, rules and schedule as identified in the submission.		
Other general submissions				
PC5LWRP-249E	DairyNZ	Retain limiting the use of OVERSEER® to resource consent processes and using "narrative" thresholds to define permitted activities.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1468	Hodder W D	Amend PC5 to include consideration of urban sprawl and need for food production in growing population.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1543	Horticulture New Zealand	Amend PC5 to include all documents which will be used to implement the plan.	Reject	We are not persuaded that the amendment requested is necessary or appropriate.
PC5LWRP-1459	Hodder W D	Amend PC5 to exclude 'nutrient budget' references and replace with wording that reflects historic events.		
PC5LWRP-436	The Wolds Station Ltd	Amend PC5 to allow individual farms to receive a credit for undertaking the removal of nitrogen fixing weeds such as gorse, broom and alders from and adjacent to waterways, removal of septic tanks, fencing of waterways and buffer planting and removal of geese and other wildfowl from waterways.		
PC5LWRP-346	Huggins T	Submitter requests that PC5 goes beyond existing provisions and accounts for climate change and organic farming systems.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-249	DairyNZ	Retain the requirements for freshwater accounting.	Accept	We agree that retaining the use of the Farm Portal as a method for catchment accounting is appropriate.
PC5LWRP-1456	Hodder W D	Amend PC5 to include a margin of error in scientific data and measurements.	Reject	The submission does not give precise details of amendments requested.
PC5LWRP-1535	Horticulture New Zealand	Amend PC5 to provide for industry audited self-management schemes to work in conjunction with Council to enable growers to gain and prove compliance with the plan.		
PC5LWRP-943	Amuri Irrigation Co Limited	Amend PC5 to clarify (via a footnote or similar reference) that the policies and rules do not apply to the Coastal Marine Area (which are managed by the Regional Coastal Environment Plan) or the Hurunui, Waiau, and Jed River catchments (which are managed by the Hurunui and Waiau River Regional plan).	Reject	Provisions in the LWRP already address this matter.
PC5LWRP-1097	Hayes A	Amend PC5 to require all current and consented water takes to have a Nutrient Discharge Allowance and produce an FEP.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2665A	Forest and Bird NZ	Amend PC5 to recognise the importance of protecting outstanding natural landscapes.	Reject	The submission point does not provide details of the particular amendment sought.
PC5LWRP-1351	Canterbury District Health Board	Amend PC5 to include a staged approach, with sufficient monitoring to ensure stream nutrient levels remain within those set by the plan; and a 90% protection level is achieved.	Accept in part	The provisions in Plan Change 5 adopt a staged approach with respect to compliance with nutrient limits.
PC5LWRP-1351A	Canterbury District Health Board	Amend to include a specific statement around the protection of community water supplies.	Reject	The submission point does not provide details of the particular amendment sought.
PC5LWRP-1351B	Canterbury District Health Board	Replace the word 'avoiding' in all policies with stronger terminology, e.g 'preventing'.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				instruments.
PC5LWRP-724B	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Ensure that the Region wide provisions reflect the intent of sub-region Plan Changes 1 – 3. Retain measures that provide for a staged reduction in nutrient loss on-farm to assist with an overall cumulative reduction in nutrient loss within over-allocated catchments.	Reject	See the separate narrative on this point in the main text of this report.
PC5LWRP-1772	Lower Waitaki River Management Soc Inc	Plan does not quantify what GMP means in terms of typical nitrate nitrogen (N) and phosphorus (P) losses expected to occur from the range of farming systems, soils and climates across Canterbury when managed to agreed good management practices, yet Plan relies on GMP practice.	Reject	Plan Change 5 relies on the use of the Farm Portal to quantify nutrient losses under GMP. We therefore do not consider an amendment to the Plan Change is necessary or appropriate.
PC5LWRP-1547	Horticulture New Zealand	Amend PC5 to clearly specify that the provisions only apply where no specific sub-regional section has been developed to manage nutrient discharges.	Accept	Provisions in Plan Change 5 already address these matters.
PC5LWRP-1195A	Neal K B	Amend Plan to include a requirement for Urban Environment plans.	Reject	The submission is outside the scope of the Plan Change.
PC5LWRP-724F	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend PC5 to include provisions, including within Schedules 7 and 28, to specifically provide for and encourage the use of vegetation, other than grass filter strips, to reduce nutrient loss.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-735	Johnston R H M	Submitter opposes Zone Committees and sub regional plans.	Reject	A general statement which does not give precise details of amendments requested.
PC5LWRP-681	Barrhill Chertsey Irrigation Scheme	Amend the 'Note' under the heading 'Irrigation Schemes' on Page 92 of the LWRP as follows 1. If a property is irrigated with water from an irrigation scheme or principal water supplier that does not hold a discharge permit under Rule 5.62 or a sub-regional chapter or is not a permitted activity under Rule s 5.41A or 5.61, then it is assessed under Rules ~~5.43 to 5.59~~5.42A to 5.59A .	Reject	The submission is outside the scope of the Plan Change. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-634	Central Plains Water Ltd	Amend the 'Note' under the heading 'Irrigation Schemes' on Page 92 of the LWRP as follows 1. If a property is irrigated with water from an irrigation scheme or principal water supplier that does not hold a discharge permit under Rule 5.62 or a sub-regional chapter or is not a permitted activity under Rule s 5.41A or 5.61, then it is assessed under Rules ~~5.43 to 5.59~~5.42A to 5.59A .		
PC5LWRP-351	Dairy Holdings Limited	Amend the 'Note' under the heading 'Irrigation Schemes' on Page 92 of the LWRP as follows 1. If a property is irrigated with water from an irrigation scheme or principal water supplier that does not hold a discharge permit under Rule 5.62 or a sub-regional chapter or is not a permitted activity under Rule s 5.41A or 5.61, then it is assessed under Rules ~~5.43 to 5.59~~5.42A to 5.59A .		
PC5LWRP-387	Hunter Downs Development Company Limited	Amend the 'Note' under the heading 'Irrigation Schemes' on Page 92 of the LWRP as follows 1. If a property is irrigated with water from an irrigation scheme or principal water supplier that does not hold a discharge permit under Rule 5.62 or a sub-regional chapter or is not a permitted activity under Rule s 5.41A or 5.61, then it is assessed under Rules ~~5.43 to 5.59~~5.42A to 5.59A .		
PC5LWRP-2197	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend PC5 Part A to ensure land use in short-length, coastal catchments that discharge to marine environments are subject to nutrient management requirements that are designed to meet marine and coastal environment objectives rather than freshwater objectives for inland bodies.	Reject	The regulation of discharges into the Coastal Marine Area is outside the scope of Plan Change 5.
PC5LWRP-724A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend PC5 to ensure the approach to Good Management Practice is reviewed every five years to reflect new approaches, innovations and knowledge and any necessary plan changes made.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1303C	Benmore Station	Submitter opposes the use of general rules that require compliance with GMP where a farmer's property spans several zones.	Accept in part	This submission point requests provision in Plan Change 5 for an alternative method where a farm spans multiple zones. We agree that, in limited circumstances, an alternative is appropriate and have recommended changes accordingly. See also Chapter 9 of this report.
PC5LWRP-1019	Morven Glenavy Ikawai Irrigation Co Ltd	Amend PC5 to ensure consistency in dates that information is to be entered into Farm Portal.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-782	Waitaki Irrigators Collective Ltd	Amend PC5 to ensure consistency in dates that information is to be entered into Farm Portal.		
PC5LWRP-713	Johnston R H M	Amend PC5 to achieve a reduction in the need for farmers to employing a consultant.		
PC5LWRP-250B	DairyNZ	Amend PC5 • to avoid the application of proxies on a farm by farm basis; • to delete the use of proxies as the sole or primary basis for a prohibited activity or declining a consent; • and to include Phosphorus Risk Zones identification through the Farm Portal to aid farmers in identifying if they have Phosphorus Risk Zone on their property.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-249D	DairyNZ	Retain provisions that rely on the state of the catchment as a means to determining whether further intensification may occur.	Accept in part	Provisions in the LWRP already address this matter.

New Definitions Sought

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
Certified Nutrient Management Adviser				
PC5LWRP-1148	Fertiliser Association of New Zealand	Insert a new definition of 'Certified Nutrient Management Adviser': means a Nutrient Management Adviser certified under the Nutrient Manager Adviser Certification Programme Ltd.	Accept in part	We have recommended amendments to the definition of 'Accredited Farm Consultant' which enable persons that have been certified as a 'Certified Nutrient Manager' to be considered as an 'Accredited Farm Consultant'.
PC5LWRP-1606	Ravensdown Limited	Insert a definition of 'Certified Nutrient Management Advisor' as follows: means a Nutrient Management Advisor certified under the Nutrient Manager Adviser Certification Programme Ltd. Or such other or alternative wording which would properly address the concerns raised.		
Change of Land use				
PC5LWRP-2499	Forrester J and R	Insert new definition of 'Change of land use' as follows: means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or - Any increase in the number of cattle 'winter grazed' on a property; or - Any change to a dairy system; From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed,	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2612	Maungatahi Farm Limited	Insert new definition of 'Change of land use' as follows: Means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		- Any increase in the number of cattle 'winter grazed' on a property; or - Any change to a dairy system; From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed,		
PC5LWRP-2413	McLean G and M	Insert new definition of 'Change of land use' as follows: Means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or - Any increase in the number of cattle 'winter grazed' on a property; or - Any change to a dairy system; From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed,		
PC5LWRP-2594	Munro A R and K H	Insert new definition of 'Change of land use' as follows: means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or - Any increase in the number of cattle 'winter grazed' on a property; or - Any change to a dairy system; From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed,		
PC5LWRP-2038	Murchison JG and LM	Insert new definition of 'Change of land use' as follows: means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or- Any increase in the number of cattle 'winter grazed' on a property; or - Any change to a dairy system; From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed		
PC5LWRP-2410	Rangatahi Downs Land Trust	Insert new definition of 'Change of land use' as follows: means: - Any increase in the amount of land irrigated or consented to be irrigated on a property; or - Any increase in the number of cattle 'winter grazed' on a property; or - Any change to a dairy system; From that occurring as at 01 February 2016 or authorized by a resource consent which has not lapsed.		
Farm Environment Plan				
PC5LWRP-1583	Horticulture New Zealand	Insert a new definition of 'Farm Environment Plan' as follows: A plan that describes the objectives and targets for environmental management of a property for the management areas listed in Schedule 7. A Farm Environment Plan can be based on either: a) the criteria in Schedule 7 Part B or b) an industry prepared Farm Environment Plan template or an Industry Audited Self-Management Programme which is approved by the Chief Executive of Canterbury Regional Council as meet the criteria set out in Schedule 7 Part A (2)(a).	Reject	The submission point does not provide sufficient detail relating to the content of the 'Industry Audited Self-Management Scheme Programme'.
Intensive Winter Grazing				
PC5LWRP-829A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming	Insert a definition of 'Intensive Winter Grazing'.	Reject	We note a definition of 'winter grazing' is already proposed by Plan Change 5 and are not persuaded that the additional definition requested would be a more effective and reasonably practicable option for achieving

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited			the objectives of the LWRP, and for giving effect to the superior instruments.
Loss Rate Assessed as Baseline GMP				
PC5LWRP-214	DairyNZ	Insert new definition of 'Loss Rate Assessed as Baseline GMP' as follows: Means the highest annual rate of loss below the root zone that is estimated to have occurred over the baseline period based on the farm property adopting Good Management Practices as assessed through a resource consent process.	Accept in part	In response to this and other submissions are recommending the inclusion of new definitions of Equivalent Baseline GMP Loss Rate and Equivalent Good Management Practice Loss Rate which substantially give effect to the relief sought.
PC5LWRP-1857	Fonterra Co-operative Group Ltd	Insert a new definition of 'Loss Rate Assessed as Baseline GMP' as follows: 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. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
Loss Rate Assessed as Good Management Practice				
PC5LWRP-213	DairyNZ	Insert new definition 'Loss Rate Assessed as Good Management Practice' as follows: Means the highest annual rate of nitrogen loss below the root zone that is estimated to occur over the most recent four year period based on the farm property adopting Good Management Practices as assessed through a resource consent process.	Accept in part	In response to this and other submissions are recommending the inclusion of new definitions of Equivalent Baseline GMP Loss Rate and Equivalent Good Management Practice Loss Rate which substantially give effect to the relief sought.
PC5LWRP-1854	Fonterra Co-operative Group Ltd	Insert a new definition of 'Loss Rate Assessed as Good Management Practice' as follows: 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. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
Nutrient User Group				
PC5LWRP-392	Barrhill Chertsey Irrigation Scheme	Insert a definition of 'Nutrient User Group': means a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-171	Dairy Holdings Limited	Insert a definition of 'Nutrient User Group': means a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management.		
Recognised Farm Management Programme				
PC5LWRP-2351	McLean G and M	Insert new definition of 'Recognised Farm Management Programme' as follows: means: a programme for farm management that is being undertaken by the farmer and includes steps to identify and manage potential effects of farming activities on water quality.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2568	Munro A R and K H	Insert new definition of 'Recognised Farm Management Programme' as follows: means: a programme for farm management that has been undertaken by the farmer and includes steps		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		to identify and manage potential effects of farming activities on water quality.		
PC5LWRP-2350	Rangatahi Downs Land Trust	Insert new definition of 'Recognised Farm Management Programme' as follows: means: a programme for farm management that has been undertaken by the farmer and includes steps to identify and manage potential effects of farming activities on water quality.		
PC5LWRP-2465	Forrester J and R	Insert new definition of 'Recognised Farm Management Programme' as follows: means: a programme for farm management that has been prepared for that farm by either the farmer or another suitably qualified individual or organization and includes provisions to identify and manage potential effects of farming activities on water quality.		
PC5LWRP-2464	Forrester K	Insert new definition of 'Recognised Farm Management Programme' as follows: means: a programme for farm management that has been prepared for that farm by either the farmer or another suitably qualified individual or organisation and includes provisions to identify and manage potential effects of farming activities on water quality. Suitably qualified organisations include but are not limited to; Beef and Lamb, Dairy NZ, Foundation for Arable Research, Horticulture NZ, NZ Winegrowers Association, Irrigation NZ and registered farm consultants.		
PC5LWRP-2542	Maungatahi Farm Limited	Insert new definition for Recognised Farm Management Programme as follows: means: a programme for farm management that has been prepared for that farm by either the farmer or another suitably qualified individual or organization and includes provisions to identify and manage potential effects of farming activities on water quality. Recognized farm management programmes include but are not limited to farm environment programmes and prepared by Beef & Lamb, Dairy NZ, Foundation for Arable Research, Horticulture NZ, NZ Winegrowers Association, Irrigation NZ and registered farm consultants.		
PC5LWRP-2170	Sloss K	Insert new definition for 'Recognised Farm Management Programme' as follows: means: a programme for farm management that has been prepared for that farm by either the farmer or another suitably qualified individual or organization and includes provisions to identify and manage potential effects of farming activities on water quality. Recognized farm management programmes include but are not limited to farm environment programmes and prepared by Beef & Lamb, Dairy NZ, Foundation for Arable Research, Horticulture NZ, NZ Winegrowers Association, Irrigation NZ and registered farm consultants.		

Definitions, Translations and Abbreviations

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
General				
PC5LWRP-479	Ballance Agri-Nutrients Limited	Amend definitions to include reference to 'material change' consistent with that adopted within Schedule 24 of Variation 1.	Reject	We consider that the common meaning of the words 'material change' is sufficiently clear.
Accredited Farm Consultant				
PC5LWRP-205	DairyNZ	Retain definition of 'Accredited Farm Consultant' as notified.	Accept in part	Except to the extent that in response to other submissions we are recommending omissions or amendments to the notified definition, we recommend it is retained as notified.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-864	Fertiliser Association of New Zealand	Retain definition of 'Accredited Farm Consultant' as notified.		
PC5LWRP-1220	Ravensdown Limited	Retain definition of 'Accredited Farm Consultant' as notified.		
PC5LWRP-723	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend definition of 'Accredited Farm Consultant' to include an additional requirement as follows: Has completed a course approved by Te Rūnanga o Ngāi Tahu and supplied to Environment Canterbury that addresses cultural competencies.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1078	Dave Ashby Rural Consultants Limited	Amend definition of 'Accredited Farm Consultant' as follows: means a person that holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand Agriculture from Massey University or holds any other qualification, that has been approved by the Chief Executive of Environment Canterbury, as being an equivalent standard with respect to the knowledge and competencies required ~~a. has been certified by the New Zealand Institute for Primary Industry Management as meeting the criteria for a 'Certified Dairy Farm System Consultant'; or~~ ~~b. holds any other qualification, that has been approved by the Chief Executive of Environment Canterbury, as being an equivalent standard with respect to the knowledge and competencies required.~~		
PC5LWRP-1550	Horticulture New Zealand	Amend the definition of 'Accredited Farm Consultant' as follows: a) A person who holds a Certificate of Completion in Advance Sustainable Nutrient Management in NZ Agriculture from Massey University and has been certified by the NZ Institute of Primary Industry Management as meeting the criteria for a Certified Dairy Farm System Consultant; or b) Holds any other qualification that has been approved by the Chief Executive of Environment Canterbury as being equivalent standard with respect of the knowledge and competencies required ; or c) Is listed on the approved cropping consultant/agronomist list as prepared by ECAN in consultation with industry (displayed on the ECAN website).		
PC5LWRP-948	Amuri Irrigation Co Limited	Amend the definition of 'Accredited Farm Consultant' as follows: Means a person that either : a. holds a Certificate of Completion … from Massey University; and has been certified … consultant; or…		
PC5LWRP-1523	Mackenzie Irrigation Company Ltd	Amend the definition of 'Accredited Farm Consultant' to clarify 'other qualifications' that are likely going to meet clause (b) of the definition. OR Amend the reference in the rules from Accredited Farm Consultant to Certified Farm Environment Plan Auditor.		
PC5LWRP-2663A	Mackenzie Irrigation Company Ltd	Amend definition of Accredited Farm Consultant to clarify 'other qualifications' that are likely going to meet clause (b) of the definition	Reject	We consider that limiting the extent to which 'other qualifications' qualify under this definition would be inappropriate.
PC5LWRP-1781	Forest and Bird NZ	Amend the definition of 'Accredited Farm Consultant' to include a schedule outlining the knowledge and competencies required for approval to be considered by the CE of ECAN.		
Audit				

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-866	Fertiliser Association of New Zealand	Retain the definition 'Audit' as notified.	Accept in part	Except for a change made under Clause 16 of Schedule 1 to the RMA we recommend that the definition remains as notified.
PC5LWRP-206	DairyNZ	Retain the definition of 'Audit' as notified.		
PC5LWRP-1783	Forest and Bird NZ	Amend the definition of 'Audit' to include identification of non-compliance with consent conditions and objectives and targets of the farm environment plan in setting remediation actions.	Reject	
PC5LWRP-1596	Ravensdown Limited	Amend the definition for 'Audit' as follows: means an assessment of the performance of a farming activity against the objectives and targets of a Farm Environment Plan by a Certified Farm Environment Plan Auditor, and includes… Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-1427	Beef and Lamb New Zealand Ltd	Amend the definitions of 'Audit' as follows: means an assessment of the performance of a farming activity ~~against the~~in achieving the industry agreed Good Management Practices, the farm specific objectives and targets of a Farm Environment Plan, and includes identifying any ~~remedial~~ actions to be carried out to achieve the objectives and targets of the Farm Environment Plan and an overall grading based on the assessment of the property. Or words to similar effect.		
PC5LWRP-2237	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend the definition of 'Audit' as follows: means an assessment of the performance of a farming activity ~~against the~~in achieving the industry agreed Good Management Practices, the farm specific objectives and targets of a Farm Environment Plan, and includes identifying any ~~remedial~~ actions to be carried out to achieve the objectives and targets of the Farm Environment Plan and an overall grading based on the assessment of the property. Or words to similar effect.		
Baseline GMP Loss Rate				
PC5LWRP-1735	Fertiliser Association of New Zealand	Retain the definition of 'Baseline GMP loss rate' subject to relief sought in PC5LWRP-867.	Accept in part	Except for a change made under Clause 10(2)(b)(i) of Schedule 1 to the RMA we recommend that the definition remains as notified.
PC5LWRP-1784	Forest and Bird NZ	Retain the definition of ' Baseline GMP Loss Rate' as notified.		
PC5LWRP-207	DairyNZ	Retain the use of 'Baseline GMP Loss Rate' as an avenue for addressing equity issues and providing confidence that all farmers are working to GMP.		
PC5LWRP-2476	Forrester J and R	Delete the definition of Baseline GMP Loss Rate and replace with the following: means the nitrogen baseline for a farming activity which has been adjusted to take account of any applicable Good Management Practices.	Reject	For the reasons advanced in the submission and legal evidence of this and other submissions, we recommend the insertion of new definitions of 'Equivalent Baseline GMP Loss Rate' and 'Equivalent GMP Loss Rate' to provide for those circumstances where the Farm Portal cannot generate an accurate nitrogen loss rate for farming activities operating at good management practice. As a consequence of those recommendations we do not recommend amendments to the definition of 'Good Management Practice Loss Rate' or 'Baseline GMP Loss Rate' as requested in these submission points.
PC5LWRP-1726A	Ravensdown Limited	Amend If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are not resolved, amend the definition of 'Baseline GMP Loss Rate', to include an exception where the Loss Rate attributed to property is demonstrably and significantly inaccurate. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-2067	Irrigation New Zealand Inc	Amend the definition 'Baseline GMP Loss Rate' as follows: means the average nitrogen loss rate below the root zone as estimated by the Farm Portal or a nitrogen loss calculation that demonstrates implementation of Good Management Practices, for the farming activity over the baseline period; and where a Baseline GMP can't be generated by		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		the portal it means the nitrogen baseline.		
PC5LWRP-207A	DairyNZ	Amend definition of 'Baseline GMP Loss Rate' as follows: means the highest annual ~~average~~ nitrogen loss rate below the root zone, as estimated by the Farm Portal, for the farming activity carried out during the nitrogen baseline period, if operated at good management practice; and where a Baseline GMP loss rate or Loss Rate Assessed as Baseline GMP cannot be generated by the Farm Portal it means the nitrogen baseline. Or words to similar effect. OR Should the relief sought in relation to the proxies not be accepted, the Definition of Baseline GMP Loss Rate should include an exception where the Loss Rate attributed to property is demonstrably and significantly inaccurate. The proxies underpinning the Baseline GMP Loss Rate should also require a robust validation process, including; - An assessment of the individual input proxies to ascertain the extent of any errors or variances, for each input proxy. - Once each input proxy has been assessed individually, a reassessment of the farm proxies is undertaken to ascertain the extent of any errors or variances across different farm types. - In the interim, a consenting pathway is developed to provide an alternative to the consenting pathway presented using the proxies. Or words to similar effect. AND In the interim, the focus should be on putting a maximum cap on N-fertiliser use (i.e. no winter N and maximum monthly applications of 50 kg N/ha/year) and reducing N surplus thereby reducing N leaching from Dairy farms.		
PC5LWRP-2592	Maungatahi Farm Limited	Delete the definition of 'Baseline GMP Loss Rate' and replace with: means the nitrogen baseline for a farming activity which has been adjusted to take account of any applicable Good Management Practices.		
PC5LWRP-2366	McLean G and M	Delete the definition of 'Baseline GMP Loss Rate' and replace with: means: nitrogen baseline for a farming activity which has been adjusted to take account of any applicable Good Management Practices.		
PC5LWRP-1870	Murchison JG and LM	Delete the definition of Baseline GMP Loss Rate and replace with: means the nitrogen baseline for a farming activity which has been adjusted to take account of any applicable Good Management Practices.		
PC5LWRP-54A	Munro A R and K H	Delete the definition of Baseline GMP Loss Rate and replace with: means the nitrogen baseline for a farming activity which has been adjusted to take account of any applicable Good Management Practices.		
PC5LWRP-2826	Rangatahi Downs Land Trust	Delete the definition of Baseline GMP Loss Rate and replace with: means the nitrogen baseline for a farming activity which has been adjusted to take account of any applicable Good Management Practices.		
PC5LWRP-1726	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the definition of 'Baseline GMP Loss Rate' as notified.	Accept in part	Except for a change made under Clause 10(2)(b)(i) of Schedule 1 to the RMA we recommend that the definition remains as notified.
PC5LWRP-266	Ellesmere Sustainable Agriculture Inc	Delete the definition 'Baseline GMP Loss Rate'.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1023	Dave Ashby Rural	Delete definition for 'Baseline GMP Loss Rate'.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Consultants Limited			
PC5LWRP-123	Barton N	Amend the definition of 'Baseline GMP Loss Rate' to enable a property holding a water permit granted prior to the notification of Plan Change 5, to be entitled to the loss rate associated with the irrigated land use identified in the water permit application.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-519	Central Plains Water Ltd	Amend the definition of 'Baseline GMP Loss Rate' to ensure the definition does not apply directly to the management of irrigation schemes.	Reject	
PC5LWRP-67	Hunter Downs Development Company Limited	Amend the definition of 'Baseline GMP Loss Rate' to ensure the definition does not apply directly to the management of irrigation schemes.		
PC5LWRP-388	Barrhill Chertsey Irrigation Scheme	Amend the definition of 'Baseline GMP Loss Rate' to ensure irrigation scheme nutrient losses continue to be managed at the Scheme level. The submitter seeks that the Baseline GMP Loss Rate does not apply to the management of irrigation scheme losses.	Accept in part	Provisions in Plan Change 5 already address these matters.
PC5LWRP-166	Dairy Holdings Limited	Amend the definition of 'Baseline GMP Loss Rate' as follows: means the ~~average~~highest annual nitrogen loss rate below the root zone, as estimated by the Farm Portal, for ~~the~~all farming activities~~y~~ carried out during the nitrogen baseline period, if operated at good management practice; and where a Baseline GMP loss rate cannot be generated by the Farm Portal it means the nitrogen baseline. The submitter seeks to ensure that the definition of 'Baseline GMP Loss Rates' are not relevant for properties receiving water from an irrigation scheme.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1551	Horticulture New Zealand	Amend the definition of Baseline GMP Loss Rate as follows: 'Baseline GMP Loss Rate' means the average nitrogen loss rate below the root zone, as estimated by the Farm Portal, for the farming activity carried out during the nitrogen baseline period, if operated at good management practice; and where a Baseline GMP loss rate cannot be generated by the Farm Portal it means the nitrogen baseline. For arable and cropping rotations the baseline GMP loss rate is the rate calculated using the proxy MGM number for intensive vegetable rotations and the representative rotations for all other cropping activities as estimated by the farm portal for the farming activity carried out during the nitrogen baseline period.		
Certified Farm Environment Plan Auditor				
PC5LWRP-209	DairyNZ	Retain definition of 'Certified Farm Environment Plan Auditor' as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1184	Dave Ashby Rural Consultants Limited	Amend the definition of 'Certified Farm Environment Plan Auditor' to require approval of the Chief Executive of Environment Canterbury.	Accept	
PC5LWRP-1092	Dave Ashby Rural Consultants Limited	Amend definition of 'Certified Farm Environment Plan Auditor' (2) as follows: 2. is a current member of a Professional Institute that requires members to subscribe to ~~a~~n appropriate Code of Ethics and has a procedure in place for dealing with complaints made against members; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-750	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend definition of 'Certified Farm Environment Plan Auditor' to include an additional requirement as follows: Has completed a course approved by Te Rūnanga o Ngāi Tahu and supplied to Environment Canterbury that addresses cultural competencies.	Reject	
PC5LWRP-1786	Forest and Bird NZ	Amend the definition of 'Certified Farm Environment Plan Auditor' to include a description of how demonstrating proficiency will be achieved.	Reject	We note that the Farm Environment Plan Audit Manual sets out the requirements for auditors.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-970	Amuri Irrigation Co Limited	Amend the definition of 'Certified Farm Environment Plan Auditor', to delete clause (3); OR amend clause (3) to clearly state the 'demonstration standards' and clarify they do not 'sit outside' of the LWRP; AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	
PC5LWRP-1567	Horticulture New Zealand	Amend the definition of 'Certified Environment Plan Auditor' as follows: A person that is either (a)~~(b)~~an auditor that is operating under~~is a member of~~ an International Standards Organisation accredited ~~audit programme~~ certification body (or equivalent organisation) that has been approved by the Chief Executive of Environment Canterbury; ~~as including audit criteria equivalent to that set out in Part C of Schedule 7.~~ or (b)~~(a)~~ is approved by the Chief Executive of Environment Canterbury as meeting the following criteria and is registered on the Environment Canterbury website as a Certified Farm Environment Plan Auditor..." [and] the listed criteria 1-3 as proposed;	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1430	Beef and Lamb New Zealand Ltd	Amend the definitions of 'Certified Farm Environment Plan Auditor' as follows: (b) is a member of an International Standards Organisation accredited audit farm risk assessment programme that has been approved by the Chief Executive of Environment Canterbury as including audit criteria equivalent to that set out in Part C of Schedule 7; and… 2. is a current member of a Professional Institute relevant to Farm Environmental Plan auditing , that requires members to subscribe to a Code of Ethics and has a procedure in place for dealing with complaints made against members; and…. OR words to similar effect AND Amend the above definition as follows "3. Demonstrate to Environment Canterbury proficiency in the auditing of Farm Environmental Plans against the matters set out in Part C of Schedule 7…"	Accept in part	In response to this submission, and for the reasons advanced in that submission, we have recommended amendments to clause 2 of this definition.
PC5LWRP-1202	Fertiliser Association of New Zealand	Amend the definition of 'Certified Farm Environment Plan Auditor' as follows: 1. at least five years' professional experience in the management of pastoral, horticultural or arable farm systems: and (a) holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand from Massey University; ~~or~~ ~~(b) holds a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture from Massey University; or~~ ~~(c) holds a tertiary qualification in agricultural science or demonstrated an equivalent level of knowledge and experience; and~~ OR: ~~(a) holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand from Massey University; or~~ ~~(b) holds a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture from Massey University; or~~ ~~(c)~~ holds a tertiary qualification in agricultural science or demonstrated an equivalent level of knowledge and experience; and ...	Accept in part	In response to this and other submissions we recommend some amendments to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1607	Ravensdown Limited	Amend the definition for 'Certified Farm Environment Plan Auditor' as follows: 1. at least five years' ~~professional~~ experience in the management of pastoral, horticultural or		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		arable farm systems: and (a) holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand from Massey University; ~~or~~ ~~(b) holds a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture from Massey University; or~~ ~~(c) holds a tertiary qualification in agricultural science or demonstrated an equivalent level of knowledge and experience; and~~ OR ~~(a) holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand from Massey University; or~~ ~~(b) holds a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture from Massey University; or~~ ~~(c)~~ holds a tertiary qualification in agricultural science or demonstrated an equivalent level of knowledge and experience; and ... Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-475	Rangitata Diversion Race Management Limited	Delete clause (3) from the definition of 'Certified Farm Environment Plan Auditor', OR Amend (3) to clearly state the 'demonstration standards' in the plan and clarify they do not sit outside of the LWRP. And make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We note that the Farm Environment Plan Audit Manual sets out the requirements for auditors.
Farm Portal				
PC5LWRP-208	DairyNZ	Retain definition of 'Farm Portal' as notified.	Accept	We agree the existing definition is appropriate.
PC5LWRP-1785	Forest and Bird NZ	Retain the definition of 'Farm Portal' as notified.		
PC5LWRP-1727	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved retain the definition of 'Farm Portal' as notified, to identify that in the long term more satisfactory and robust modelling rules for determining GMP N loss values will be required when using the Farm Portal.	Accept in part	
PC5LWRP-1730	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are not resolved, amend the definition of 'Good Management Loss Rate', to identify that in the long term more satisfactory and robust modelling rules for determining GMP N loss values will be required when using the Farm Portal, and to provide for those farms systems which the Farm Portal cannot generate a satisfactory GMP loss rate. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-1025	Dave Ashby Rural Consultants Limited	Amend the definition of 'Farm Portal' as follows: means the nutrient management database accessed at http://www.farmportal.ecan.govt.nz/ and that is used to derive ~~a Baseline GMP Loss Rate and~~ Good Management Practice Loss Rate, in accordance with Schedule 28.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1554	Horticulture New Zealand	Amend the definition of Farm Portal to exclude the words: 'in ~~accordance with Schedule 28~~.';		
PC5LWRP-267	Ellesmere Sustainable Agriculture Inc	Delete the definition 'Farm Portal', and make any consequential amendments.	Reject	
PC5LWRP-516	Central Plains Water Ltd	Amend the definition of 'Farm Portal' to ensure the Farm Portal:	Accept in part	This submission point does not give precise details of the amendment

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		• is used/structured in a manner that accommodates properties converting to irrigation. • is corrected to correctly represent Schedule 28 and the proxy's and any other errors are corrected. • provides accurate outputs that correctly reflect good management practices.		requested. However we not the Farm Portal is configured in a way that it can estimate nutrient losses from dryland properties converting to irrigation.
PC5LWRP-63	Hunter Downs Development Company Limited	Amend the definition of 'Farm Portal' to ensure the Farm Portal: • is used/structured in a manner that accommodates properties converting to irrigation. • is corrected to correctly represent Schedule 28 and the proxy's and any other errors are corrected. • provides accurate outputs that correctly reflect good management practices.		
PC5LWRP-127	Barton N	Amend the definition of the Farm Portal to include the transition period for converting to irrigation and ensure that the modelling proxies used to represent Good Management Practice are not used in a prescriptive way.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
Good Management Practices				
PC5LWRP-389	Barrhill Chertsey Irrigation Scheme	Retain the definition of 'Good Management Practices' as notified.	Accept	We agree that the existing definition is appropriate.
PC5LWRP-520	Central Plains Water Ltd	Retain the definition of 'Good Management Practices' as notified.		
PC5LWRP-167	Dairy Holdings Limited	Retain 'Good Management Practices' as notified.		
PC5LWRP-210	DairyNZ	Retain definition of 'Good Management Practices' as notified.		
PC5LWRP-1204	Fertiliser Association of New Zealand	Retain the definition of 'Good Management Practice' as notified.		
PC5LWRP-84	Hunter Downs Development Company Limited	Retain the definition of 'Good Management Practices' as notified.		
PC5LWRP-890	Opuha Water Limited	Retain the definition of ’Good Management Practice' as notified.		
PC5LWRP-2710	Ravensdown Limited	Retain the definition of 'Good Management Practice' as notified.		
PC5LWRP-752	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend definition of 'Good Management Practices' 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.	Reject	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions in Schedule 7, we recommend that they are retained as notified.
PC5LWRP-1787	Forest and Bird NZ	Amend the definition of 'Good Management Practices' to provide some more guidance about the practices it is referring to.	Reject	The practices referred to in this definition are set out in the Industry-agreed Good Management Practices relating to water quality booklet. We do not consider further amendment to the definition is necessary or appropriate.
Good Management Practice Loss Rate				
PC5LWRP-1085	Dave Ashby Rural Consultants Limited	Retain definition of 'Good Management Practices Loss Rate' as notified.	Accept	We agree that the existing definition is appropriate.
PC5LWRP-2473	Forrester J and R	Delete definition of Good Management Practice Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2590	Maungatahi Farm Limited	Delete definition of 'Good Management Practice Loss Rate'.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2364	McLean G and M	Delete definition of 'Good Management Practice Loss Rate'.		
PC5LWRP-2573	Munro A R and K H	Delete definition of 'Good Management Practice Loss Rate'.		
PC5LWRP-1890	Murchison JG and LM	Delete definition of 'Good Management Practice Loss Rate'.		
PC5LWRP-2363	Rangatahi Downs Land Trust	Delete definition of 'Good Management Practice Loss Rate'.		
PC5LWRP-268	Ellesmere Sustainable Agriculture Inc	Delete the definition 'Good Management Practice Loss Rate'.		
PC5LWRP-916	Orari Catchment Group	Amend definition of 'Good Management Practice Loss Rates' to allow for an option for farms to choose between the use of the GMP loss rate as calculated by the farm portal or an OVERSEER® (not farm portal) model prepared by a suitably qualified person with sufficient evidence to support the reason for the use of the OVERSEER® modelled GMP loss rate.		
PC5LWRP-1788	Forest and Bird NZ	Amend the definition of 'Good Management Practice Loss Rate' to ensure that the rate is calculated good management practice for four years.	Reject	The definition already addresses this matter.
PC5LWRP-1241	Fertiliser Association of New Zealand	Amend the definition of 'Good Management Practice Loss Rates' to provide for farm systems which the Farm Portal cannot generate a satisfactory GMP loss rate. Submitter states that alternative methods will be considered and suggested.	Accept in part	For reasons advanced in the submission and legal evidence of this and other submissions, we recommend the insertion of new definitions of 'Equivalent Baseline GMP Loss Rate' and 'Equivalent GMP Loss Rate'. As a consequence of those recommendations we do not recommend amendments to the definition of 'Good Management Practice Loss Rate'
PC5LWRP-2068	Irrigation New Zealand Inc	Amend the definition of 'Good Management Practice Loss Rate' as follows: means the average nitrogen loss rate below the root zone as estimated by the Farm Portal or a nitrogen loss calculation that demonstrates implementation of Good Management Practice's over the most recent four-year period, if operated at good management practice.	Accept in part	
PC5LWRP-744	Rangitata Dairies	Amend definition of Good Management Practice Loss Rates to allow for an option for farms to choose between the use of the GMP loss rate as calculated by the farm portal or an OVERSEER® (not farm portal) model prepared by a suitably qualified person with sufficient evidence to support the reason for the use of the OVERSEER® modelled GMP loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-137	Barton N	Amend the definition 'Good Management Practice Loss Rate' as follows: means the [~~average~~] nitrogen loss rate below the root zone, as estimated by the Farm Portal, for: - the farming activity with the highest annual losses carried out over the most recent four year period, if operated at good management practice; or - in the case of a property that has converted to irrigation, the irrigated land use, if operated at good management practice.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-212	DairyNZ	Amend definition of 'Good Management Practice Loss Rate' as follows: means the highest annual ~~average~~ nitrogen loss rate below the root zone, as estimated by the Farm Portal, for the farming activity carried out over the most recent four year period, if operated at good management practice. Or words to similar effect.		
PC5LWRP-1579	Horticulture New Zealand	Amend the definition of 'Good Management Practice Loss Rate' as follows: The average nitrogen loss rate below the root zone, as estimated by the Farm Portal, for the farming activity carried out over the most recent four year period, if operated at good management practice ~~.~~ and where a Good Management Practice Loss Rate cannot be generated by the Farm Portal it means the nitrogen baseline. For arable and cropping rotations the GMP Loss Rate is the rate calculated using the proxy MGM number for intensive vegetable rotations and the representative rotations for all other cropping activities as estimated by the	Accept in part	Consequent on our recommended insertion of a new definition of Equivalent Good Management Practice Loss Rate the requested amendment to the definition would serve no purpose.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		farm portal for the farming activity carried out during the nitrogen baseline period.		
PC5LWRP-390 PC5LWRP-521 PC5LWRP-168 PC5LWRP-85	Barrhill Chertsey Irrigation Scheme Central Plains Water Ltd Dairy Holdings Limited Hunter Downs Development Company Limited	Amend the definition of 'Good Management Practice Loss Rate' as follows: means the average nitrogen loss rate below the root zone, as estimated by the Farm Portal, for : • the farming activity with the highest annual losses carried out over the most recent four year period, if operated at good management practice; or • in the case of a property that has converted to irrigation, the irrigated land use, if operated at good management practice.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
Management Plan				
PC5LWRP-215	DairyNZ	Retain definition of 'Management Plan' as notified.	Accept	We agree that the existing definition is appropriate
PC5LWRP-1242	Fertiliser Association of New Zealand	Retain the definition of 'Management Plan' as notified.		
PC5LWRP-2711	Ravensdown Limited	Retain the definition of 'Management Plan' as notified.		
PC5LWRP-1789	Forest and Bird NZ	Amend the definition of 'Management Plan' to be defined as 'Management Plan for Farming Activities'.	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term.
PC5LWRP-838	Opuha Water Limited	Amend the definition of 'Management Plan' as follows: … for the avoidance of doubt, a Farm Environment Plan prepared in accordance with Schedule 7 is a Management Plan. Or words to similar effect.	Accept in part	We address the issues raised by this submission point elsewhere in this report.
Nitrogen Baseline				
PC5LWRP-1244	Fertiliser Association of New Zealand	Retain the definition of 'Nitrogen Baseline' as notified.	Accept	We agree that the existing definition is appropriate
PC5LWRP-2712	Ravensdown Limited	Retain the definition of 'Nitrogen Baseline' as notified.		
PC5LWRP-1790	Forest and Bird NZ	Retain the definition of 'Nitrogen Baseline' (a).		
PC5LWRP-1582	Horticulture New Zealand	Retain the definition of 'Nitrogen Baseline' as notified, but add a new clause as follows: d) where the farm system cannot be adequately represented through OVERSEER® and the Farm Portal, the MGM proxy for the farm type overlaid with soil and climate data for the farm is applied to ascertain a leaching number for the property.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-759	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend definition of 'Nitrogen Baseline' as follows: b. In the case of where ~~a building consent and~~ an effluent discharge consent and all other relevant building, and land use consents have been granted for a farming activity ~~a new or upgraded dairy milking shed~~ in the period 01 January 2009 - 31 December 2013, the calculation under (a) will be on the basis that the ~~dairy~~ farming activity is operational; and	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term.
PC5LWRP-710	Nutrient Solutions Ltd	Amend the definition of 'Nitrogen Baseline' to ensure the nitrogen baseline is a reflection of true past production.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-2358 PC5LWRP-2471	McLean G and M Forrester J and R	Amend definition of 'Nitrogen Baseline' as follows: means: ~~a.~~ the discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Best Practice Data	Accept in part	We do not recommend an amendment to the definition but have recommended other amendments to provisions in Plan Change 5 to recognise adverse climatic conditions including droughts and floods.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2585 PC5LWRP-2572 PC5LWRP-1889 PC5LWRP-2356	Maungatahi Farm Limited Munro A R and K H Murchison JG and LM Rangatahi Downs Land Trust	Input Standards,) or an equivalent model approved by the Chief Executive of Environment Canterbury, ~~averaged over a 48 month consecutive period in the years of the period of 01 July 2009 – 30 June 2013 inclusive, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and~~using land use data which is representative of the farming activities which take place on the farm but excluding any destocking or reduction in area under cultivation as a result of adverse climatic events such as drought or flooding; or The land use is authorised by resource consent for the property which has not lapsed. ~~b. in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 July 01 January 2009 – 30 June 31 December 2013, the calculation under (a) will be on the basis that the dairy farming activity is operational; and~~ ~~c. if OVERSEER® is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data for the same period as used in (a) above. 01 July 2009 – 30 June 2013.~~		
PC5LWRP-169	Dairy Holdings Limited	Amend the definition of 'Nitrogen Baseline' as follows: means: a. the highest annual discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Best Practice Data Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury, averaged over ~~a 48 month consecutive period in~~ the years of 2009 – 2013 inclusive, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and (d) in the case of an irrigation scheme, the maximum, as included in a resource consent: (i) rate at which nitrogen may be leached from the properties supplied water by the irrigation scheme or principal water supplier; or (ii) concentration of nitrogen in drainage water leached from the properties supplied water by the scheme or principal water supplier.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-216	DairyNZ	Amend definition of 'Nitrogen baseline' as follows: a. the discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Best Practice Data Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury, calculated as the highest annual loss ~~averaged~~ over a 48 month consecutive period inclusive, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and... or words to similar effect		
PC5LWRP-2236	Federated Farmers of New Zealand	Amend the definition of 'Nitrogen Baseline' as follows (or words to similar effect): a. the discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Best Practice Data Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury, calculated as the greatest loss ~~averaged~~ over a 48 month consecutive period inclusive, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and…		
PC5LWRP-1164 PC5LWRP-1526	Craigmore Farming Mackenzie Irrigation Company Ltd	Amend the definition of 'Nitrogen Baseline' (b) as follows: (b) in the case where a ~~building~~ consent ~~and effluent discharge consent have~~ has been granted ~~for a new or upgraded dairy milking shed~~ in the period 01 January 2009 to 31 December 2013, the calculation under (a) will be on the basis that the ~~dairy farming~~ activity is operational; and	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-855 PC5LWRP-1123 PC5LWRP-2061 PC5LWRP-901 PC5LWRP-969 PC5LWRP-1104 PC5LWRP-1995 PC5LWRP-1152 PC5LWRP-1176 PC5LWRP-848 PC5LWRP-898	Orari Water Users Group Haldon Station Limited Kakahu Catchment Group Killermont Station 2012 Limited Rietveld J A Twinburn Ltd Bellfield Land Co Ltd Cameron W N and S P Keeling Dairies Ltd Kokoamo Farms Limited Spectrum Group			
PC5LWRP-1790A	Forest and Bird NZ	Delete 'Nitrogen Baseline' (b).	Reject	
PC5LWRP-602 PC5LWRP-391 PC5LWRP-86	Central Plains Water Ltd Barrhill Chertsey Irrigation Scheme Hunter Downs Development Company Limited	Amend the definition of 'Nitrogen Baseline' to include: (d) in the case of an irrigation scheme, the maximum, as included in a resource consent: (i) rate at which nitrogen may be leached from the properties supplied water by the irrigation scheme or principal water supplier; or (ii) concentration of nitrogen in drainage water leached from the properties supplied water by the scheme or principal water supplier.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
Nitrogen Loss Calculation				
PC5LWRP-1245	Fertiliser Association of New Zealand	Retain the definition of 'Nitrogen loss calculation' as notified.	Accept	We agree that the existing definition is appropriate.
PC5LWRP-1791	Forest and Bird NZ	Retain the definition of 'Nitrogen loss calculation' as notified.		
PC5LWRP-2713	Ravensdown Limited	Retain the definition of 'Nitrogen Loss Calculation ' as notified.		
PC5LWRP-170	Dairy Holdings Limited	Amend the definition of 'Nitrogen loss calculation' as follows: means the highest annual discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Best Practice Data Input Standards), or an equivalent model approved by the Chief Executive of Environment Canterbury, ~~averaged~~ over the most recent four year period and expressed in kg per hectare per annum. If OVERSEER® is updated, the most recent version is to be used.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-217	DairyNZ	Amend definition of 'Nitrogen loss calculation' as follows: means the discharge of nitrogen below the root zone, as modelled with OVERSEER®, (where the required data is inputted into the model in accordance with OVERSEER® Nitrogen loss calculation Best Practice Data Input Standards,) or an equivalent model approved by the Chief Executive of Environment Canterbury, calculated as the highest annual loss ~~averaged *[over a 48 month consecutive period in the years of 2009-2013 inclusive*]~~over the most recent four year period and expressed in kg per hectare per annum. If OVERSEER® is updated, the most recent version is to be used. Or words to similar effect.		
Phosphorus Risk Zone				
PC5LWRP-220	DairyNZ	Retain definition of 'Phosphorus Risk Zone' as notified.	Accept	We agree that the existing definition is appropriate.
PC5LWRP-1246	Fertiliser Association of New Zealand	Retain the definition of 'Phosphorus Risk Zone' as notified.		
PC5LWRP-1792	Forest and Bird NZ	Retain the definition of 'Phosphorus Risk Zone' as notified.		
PC5LWRP-2714	Ravensdown Limited	Retain the definition of 'Phosphorus Risk Zone' as notified.		
PC5LWRP-269	Ellesmere Sustainable Agriculture Inc	Amend the definition 'Phosphorus Risk Zone' to include 'high runoff risk' in the title.	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term.
Principal Water Supplier				
PC5LWRP-221	DairyNZ	Retain definition of 'Principal water supplier' as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-876	Opuha Water Limited	Retain the definition of 'Principal Water Supplier' as notified.		
PC5LWRP-393	Barrhill Chertsey Irrigation Scheme	Amend the definition of 'Principal water supplier' by deleting "subsequently".	Accept	In response to this and other submissions we recommend an amendment to the effect requested.
PC5LWRP-604	Central Plains Water Ltd	Amend the definition of 'Principal water supplier' to delete the word "subsequently".		
PC5LWRP-88	Hunter Downs Development Company Limited	Amend the definition of 'Principal water supplier' to delete the word "subsequently".		
PC5LWRP-2026	Genesis Energy Limited	Amend definition of 'Principal Water Supplier' to ensure that a party with no influence or responsibility for the water's subsequent use cannot be held responsible for nutrient management. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-125	Meridian Energy Limited	Amend definition of 'Principal Water Supplier' to ensure that a party with no influence or responsibility for the water's subsequent use cannot be held responsible for nutrient management. Or words to similar effect.		
PC5LWRP-1793	Forest and Bird NZ	Amend the definition of 'Principal water supplier' as follows: a publicly or privately owned supplier of water which is subsequently conveyed and distributed to constituents of irrigation schemes , community and/or stockwater schemes, hydro-electricity generators and/or other users of the water.		
PC5LWRP-949	Trustpower Limited	Amend the definition of 'principal water supplier' as follows:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		A publicly or privately owned ~~supplier~~entity who holds resource consents or other authorisations to supply and distribute water~~that is the sole abstractor of water which is subsequently conveyed and distributed~~ to constituent irrigation schemes , community and/or stockwater schemes, hydro-electricity generators and/or other users of the water. or such alternative relief.		
Winter Grazing				
PC5LWRP-917	Orari Catchment Group	Amend definition of Winter Grazing as follows: means the intensive grazing of ~~cattle within~~dry stock (cattle, deer, pigs and sheep) between the period of 1 May to 30 September, where the ~~cattle~~ stock are ~~contained for break-feeding of~~ break fed in-situ forage ~~crops or supplementary feed that has been brought onto the property~~ and root vegetable crops.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report. Consequential changes are recommended as appropriate.
PC5LWRP-761	Rangitata Dairies	Amend the definition of Winter Grazing as follows: means the intensive grazing of ~~cattle within~~dry stock (cattle, deer, pigs and sheep) ~~within~~ between the period of 1 May to 30 September, where the ~~cattle~~ stock are ~~contained for break-feeding of~~ break fed in-situ forage ~~crops or supplementary feed that has been brought onto the property~~ and root vegetable crops.		
PC5LWRP-921	Sparrow M	Amend definition of winter grazing as follows: means the grazing of cattle that are on to a property only between~~within the period of~~ 1 May ~~to~~and 30 September, ~~where the cattle are contained for~~and that are fed predominantly by break-feeding of ~~in-situ~~ forage crops and/ or with supplementary feed that has been brought onto the property.	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term.
PC5LWRP-2722	Nutrient Solutions Ltd	Amend to clarify the definition of 'winter grazing' and if it involves cattle.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-394 PC5LWRP-172 PC5LWRP-222 PC5LWRP-868 PC5LWRP-1064 PC5LWRP-1636 PC5LWRP-2072	Barrhill Chertsey Irrigation Scheme Dairy Holdings Limited DairyNZ Opuha Water Limited Fonterra Co-operative Group Ltd Ravensdown Limited Irrigation New Zealand Inc	Amend the definition of 'Winter grazing' as follows: means the grazing of cattle within the period of 1 May to 30 September, where the cattle are contained for break-feeding of in-situ forage brassica and root vegetable crops ~~or supplementary feed that has been brought onto the property~~. Or words to similar effect.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report. Consequential changes are recommended as appropriate.
PC5LWRP-690	North Canterbury Fish and Game & SI Fish and Game	Amend the definition of 'Winter Grazing' as follows: Means the grazing of cattle...or supplementary feed that has been brought onto the property or from another part of the property.	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term.
PC5LWRP-1528	Mackenzie Irrigation Company Ltd	Amend 'Winter Grazing' definition as follows: means the grazing of cattle within the period of 1 May to ~~30 September~~31 August, where the cattle are contained for break-feeding of in-situ forage crops or supplementary feed that has	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		been brought onto the property.		
PC5LWRP-1012	Morven Glenavy Ikawai Irrigation Co Ltd	Amend the definition of 'Winter Grazing' as follows: means the grazing of cattle within the period of 1 May to 31 August ~~30 September~~, where the cattle are contained for break-feeding of in-situ forage crops or supplementary feed that has been brought onto the property.		
PC5LWRP-775	Waitaki Irrigators Collective Ltd	Amend the definition of 'Winter Grazing' as follows: means the grazing of cattle within the period of 1 May to 31 August ~~30 September~~, where the cattle are contained for break-feeding of in-situ forage crops or supplementary feed that has been brought onto the property.		
PC5LWRP-1165 PC5LWRP-1996 PC5LWRP-1177 PC5LWRP-852 PC5LWRP-899 PC5LWRP-856 PC5LWRP-2062 PC5LWRP-1124 PC5LWRP-902 PC5LWRP-971 PC5LWRP-1105	Craigmore Farming Bellfield Land Co Ltd Keeling Dairies Ltd Kokoamo Farms Limited Spectrum Group Orari Water Users Group Kakahu Catchment Group Haldon Station Limited Killermont Station 2012 Limited Rietveld J A Twinburn Ltd	Amend the definition of 'Winter Grazing' as follows: means the grazing of cattle within the period 1 May to 31 August ~~30 September~~, where ~~the~~ cattle are contained for break-feeding of in-situ forage crops or supplementary feed that has been brought onto the property. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-1438	Beef and Lamb New Zealand Ltd	Amend the definition of 'Winter Grazing' as follows: means the grazing of cattle within the period of 1 May to ~~30~~ 1 September, where the cattle are contained for break feeding of in-situ forage crops, or supplementary feed that has been brought onto the property that supports production at a higher level than from feed grown only on the property .	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term.
PC5LWRP-2239	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend the definition of 'Winter Grazing' as follows: Winter Grazing: means the grazing of cattle within the period of 1 May to ~~30~~ 1 September, where the cattle are contained for break feeding of in-situ forage crops, or supplementary feed that has been brought onto the property that supports production at a higher level than from feed grown only on the property .		
PC5LWRP-2466 PC5LWRP-2353	Forrester J and R McLean G and M	Amend definition of winter grazing as follows: means the grazing of weaned cattle within the period of 1 May to 30 September, in any year under conditions whereby ~~where~~ the cattle are contained for break-feeding of ~~in-situ~~ forage	Reject	We are not persuaded that the requested amendment to the definition would assist understanding of the intended meaning of the term. Other amendments we are recommending to recognise adverse climatic

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1943 PC5LWRP-2544 PC5LWRP-2175 PC5LWRP-2569	Murchison JG and LM Maungatahi Farm Limited Sloss K Munro A R and K H	crops or ~~supplementary feed that has been brought onto the property.~~supplements at a stocking rate of more than 15su/ha, as part of normal farming activities. It does not include the containment of cattle and feeding of supplementary crops during adverse climate events such as drought, flood or snow		conditions address this submission point.
PC5LWRP-2258	Hoban J K W	Amend definition of winter grazing as follows: means the grazing of weaned cattle within the period of 1 May to 30 September, in any year under conditions whereby where the cattle are contained for break-feeding of ~~in-situ~~ forage crops ~~supplementary feed that has been brought onto the property.~~ (not pasture) at a stocking rate of more than 15su/ha, as part of normal farming activities. It does not include the containment of cattle and feeding of supplementary crops during adverse climatic event such as drought, flood or snow		
PC5LWRP-2467 PC5LWRP-2352	Forrester K Rangatahi Downs Land Trust	Amend definition of winter grazing as follows: Winter grazing means the grazing of weaned cattle within the period of 1 May to 30 September, in any year under conditions whereby ~~where~~ the cattle are contained for break-feeding of ~~in-situ~~ forage crops or ~~supplementary feed that has been brought onto the property.~~supplements as part of normal farming activities. It does not include the containment of cattle and feeding of supplementary crops during adverse climate events such as drought, flood or snow		
PC5LWRP-1794	Forest and Bird NZ	Amend the definition of ' Winter Grazing' to include all activities that would increase nutrient loss risk including: (a) break feeding grass; (b) feeding supplementary feed that was grown on the property; AND Amend to clarify the word 'contained'.		

Section 4 - Policies

New Policies Sought

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1352	Canterbury District Health Board	Insert new policy to maintain ground water quality [deep or shallow] and quantity.	Reject	Provisions of the LWRP and Plan Change 5 already address these matters.
PC5LWRP-2135	Irrigation New Zealand Inc	Insert New Policy as follows: Irrigation Good Management Practice for water quality achieves an irrigation efficiency of not less than 80%.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2132	Irrigation New Zealand Inc	Insert New Policy as follows: Maintain water quality in Green and Light Blue zones by requiring; (a) Any application for resource consent for the discharge of nutrients submitted by an irrigation scheme or principal water supplier to describe the methods that will be used to implement the good management practices on any land that will be supplied with water from	Reject	Provisions in Plan Change 5 already address these matters.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		the scheme or water supplier.		
PC5LWRP-673	Barrhill Chertsey Irrigation Scheme	Include new policy as follows: Where any property area is amended during or following the establishment of the nitrogen baseline, the Baseline GMP Loss Rate, and the Good Management Practice Loss Rate for the new property area shall be modelled with corrected input data on the basis that: a. the amendment to the property area existed prior to the nitrogen baseline period; and b. the farming activity being carried out on the property was that occurring after the amendment to the property area, provided that the nitrogen baseline (as pro-rated across the original property areas) is not exceeded.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-674	Barrhill Chertsey Irrigation Scheme	Include a new policy [consistent with Policy 15B.4.17 of PART B]: Collectives Applications for a resource consent to establish a Nutrient User Group shall describe: (a) the procedures and methods for recording nitrogen losses from properties within the Nutrient User Group; and (b) the methods for redistributing nitrogen losses when a property joins or leaves a Nutrient User Group; and (c) the annual reporting requirements; and (d) how compliance with the actions set out in each Farm Environment Plan will be achieved.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP at a region-wide level.
PC5LWRP-191	Dairy Holdings Limited	Include a new policy [consistent with Policy 15B.4.17 of PART B]: Collectives Applications for a resource consent to establish a Nutrient User Group shall describe: (a) the procedures and methods for recording nitrogen losses from properties within the Nutrient User Group; and (b) the methods for redistributing nitrogen losses when a property joins or leaves a Nutrient User Group; and (c) the annual reporting requirements; and (d) how compliance with the actions set out in each Farm Environment Plan will be achieved.		
PC5LWRP-672	Barrhill Chertsey Irrigation Scheme	Insert new policy: 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: (a) the nitrogen loss does not exceed the nitrogen baseline; or (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: (c) the Farm Portal does not provide accurate or realistic Baseline GMP Loss rates for the farming activity undertaken; and (d) good management practices and the matters set out in Schedule 28 are being achieved.	Reject	We do not consider the amendment is appropriate, however other amendments we are recommending provide for circumstances where the Farm Portal is unable to generate an accurate nutrient loss number for a farming activity.
PC5LWRP-188	Dairy Holdings Limited	Insert new policy: 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: (a) the nitrogen loss does not exceed the nitrogen baseline; or (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: (c) the Farm Portal does not provide accurate or realistic Baseline GMP Loss rates for the		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		farming activity undertaken; and (d) good management practices and the matters set out in Schedule 28 are being achieved.		
PC5LWRP-678	Barrhill Chertsey Irrigation Scheme	Insert new Policy: 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: (a) how the nutrient load for which resource consent is sought has been calculated, and the rationale for that nutrient load applied; and (b) how nutrients from all land subject to the farming enterprise will be accounted for; and (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 (d) the proposed monitoring and reporting regime to the CRC, including, but not limited to, a description of the: (i) audit systems that will be used to assess individual on-farm compliance with the content of any Farm Environment Plan; and (ii) methods used to address non-compliances identified in individual on-farm audits; and (iii) proposed data to be collected and the frequency of any proposed reporting to the CRC.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-631	Central Plains Water Ltd	Insert new Policy: 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: (a) how the nutrient load for which resource consent is sought has been calculated, and the rationale for that nutrient load applied; and (b) how nutrients from all land subject to the farming enterprise will be accounted for; and (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 (d) the proposed monitoring and reporting regime to the CRC, including, but not limited to, a description of the: (i) audit systems that will be used to assess individual on-farm compliance with the content of any Farm Environment Plan; and (ii) methods used to address non-compliances identified in individual on-farm audits; and (iii) proposed data to be collected and the frequency of any proposed reporting to the CRC.		
PC5LWRP-194	Dairy Holdings Limited	Insert new Policy: 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: (a) how the nutrient load for which resource consent is sought has been calculated, and the rationale for that nutrient load applied; and (b) how nutrients from all land subject to the farming enterprise will be accounted for; and (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 (d) the proposed monitoring and reporting regime to the CRC, including, but not limited to, a description of the: (i) audit systems that will be used to assess individual on-farm compliance with the content of any Farm Environment Plan; and		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		(ii) methods used to address non-compliances identified in individual on-farm audits; and (iii) proposed data to be collected and the frequency of any proposed reporting to the CRC.		
PC5LWRP-687 PC5LWRP-637 PC5LWRP-246 PC5LWRP-140	Barrhill Chertsey Irrigation Scheme Central Plains Water Ltd Dairy Holdings Limited Hunter Downs Development Company Limited	Insert a new policy: Reviews of the Farm Portal will be undertaken annually by the Canterbury Regional Council for the purposes of ensuring that: (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 (b) the terminology and settings used in the Farm Portal are adjusted to align with the latest version of OVERSEER®; and (c) that any consequential changes in: (i) the Good Management Practices and Good Management Practice modelling Rules as incorporated into Schedule 28; or (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. In preparing any plan change as contemplated by Policy [X](c), the Council will: (a) establish methods and a timeframe for the implementation of any revised Baseline GMP Loss Rate and Good Management Practice Loss Rate.	Reject	It is not appropriate that the LWRP or any plan change to the LWRP direct the executive functions of Council.
PC5LWRP-764	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Insert new Policy under 'Nutrient Management' as follows: Freshwater quality is maintained or improved within catchment management zones by enabling the ability to establish provisions for Good Management Practice Loss Rates that in turn enable the management of freshwater to meet a specific water quality limit or limits. Measures may include staged reduction of nutrient losses, maximum nutrient loss rates and permitted levels of nutrient loss. AND Ensure that the provisions in Part A do not limit the ability for any future plan change for Zones to introduce caps or permitted activity baselines.	Reject	This submission point was not pursued at the hearing.
PC5LWRP-2431	Forrester K	Delete all Part A Policies excluding Policy 4.24 and replace with policies which: (i) Recognize the need for farmers to retain flexibility in their land uses to provide for their economic well-being and the economic well-being of New Zealand, and to ensure any regime provides for flexibility in land uses within limits for N loss that are appropriate considering both the need for farmers to make reasonable use of their interests in their land, and the sensitivity of the receiving environment. (ii) Promote that all farming activities should use the industry agreed Good Management Practices or other appropriate farm management programmes to minimize the risk of N or P/sediment losses to water. (iii) Specify that any management of existing farming activities that is necessary to manage N losses or P/sediment losses beyond adopting GMPs is done as part of catchment planning processes. However Plan Change 5 should be sending a signal that those catchment process but should follow a principle that any management of N or P/sediment losses should be commensurate with the amount of N or sediment/P an activity is contributing to the problem; and should consider both the sensitivity of the receiving environment and appropriate timeframes for people to adjust their land uses or invest in additional infrastructure where necessary. (iv) To manage changes to land uses in the interim to avoid people shifting from relatively low to relatively high N loss land uses within Red, Orange and Lake Sensitive zones; and to ensure any change for land use in Blue or Green zones will not affect water quality in those	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		catchments.		
PC5LWRP-2097	Sloss K	Delete all Part A policies excluding 4.24 and replace with policies which: (i) Recognize the need for farmers to retain flexibility in their land uses to provide for their economic well-being and the economic well-being of New Zealand, and to ensure any regime provides for flexibility in land uses within limits for N loss that are appropriate considering both the need for farmers to make reasonable use of their interests in their land, and the sensitivity of the receiving environment. (ii) Promote that all farming activities should use the industry agreed Good Management Practices or other appropriate farm management programmes to minimize the risk of N or P/sediment losses to water. (iii) Specify that any management of existing farming activities that is necessary to manage N losses or P/sediment losses beyond adopting GMPs is done as part of catchment planning processes. However Plan Change 5 should be sending a signal that those catchment process but should follow a principle that any management of N or P/sediment losses should be commensurate with the amount of N or sediment/P an activity is contributing to the problem; and should consider both the sensitivity of the receiving environment and appropriate timeframes for people to adjust their land uses or invest in additional infrastructure where necessary. (iv) To manage changes to land uses in the interim to avoid people shifting from relatively low to relatively high N loss land uses within Red, Orange and Lake Sensitive zones; and to ensure any change for land use in Blue or Green zones will not affect water quality in those catchments.		
PC5LWRP-2450 PC5LWRP-2307 PC5LWRP-2319	Forrester J and R McLean G and M Rangatahi Downs Land Trust	Delete all Part A Policies excluding Policy 4.24 and replace with: 1. Farmers, mana whenua and the Council work in partnership to ensure all farming activities are operating at GMP or better. 2. Farming activities with higher potential nitrogen or phosphorus/ sediment losses are managed through a combination of nitrogen loss controls and Farm Environment Plans as appropriate to maintain water quality in the receiving environment, without unnecessarily restricting flexibility in farming activities or changes in land use. 3. Continual improvement in the knowledge of the state of water bodies within the region and the cause(s) of any deterioration in water quality by the Council, in partnership with the community, implementing a comprehensive water quality monitoring and investigations programme using data from scientific investigations and local knowledge. 4. Where appropriate, limiting the duration for which resource consents may be granted for activities which have high potential impacts on water quality in a catchment and a long duration consent may unduly compromise the ability to address water quality issues through catchment planning processes. 5. In Lake Sensitive Zones, there is no deterioration in water quality as a result of the discharge of contaminants or nitrogen or phosphorus/ sediment losses from land uses in the catchment. 6. In Red and Orange Nutrient Allocation Zones: i) There is no further deterioration of water quality as a result of changes in land use; and ii) Improvements in water quality result from reductions in nitrogen or phosphorus/ sediment losses as land uses operate at GMP or better. 7. In Blue and Green Nutrient Allocation Zones changes in land uses do not adversely affect existing water quality. 8. In Nutrient Allocation Zones where reductions in nitrogen losses from land uses are required beyond GMPs to achieve water quality outcomes, these reductions will be identified in sections 6 to 15 of this plan as part of the catchment planning and limit setting processes; and will be based on the following principles:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		i) Requiring those land uses which have the greatest losses making the most reductions, allowing for the effects of soil type and rainfall on nitrogen losses; and ii) Ensuring the pathways and timeframes for nitrogen reductions are reasonable, considering any investment required in new infrastructure or any requirements to change land use		
PC5LWRP-2518	Maungatahi Farm Limited	Delete Policy 4.11 and replace with a policy to: (i) Recognise the need for farmers to retain flexibility in their land uses to provide for their economic well-being and the economic well-being of New Zealand, and to ensure any regime provides for flexibility in land uses within limits for N loss that are appropriate considering both the need for farmers to make reasonable use of their interests in their land, and the sensitivity of the receiving environment. (ii) Promote that all farming activities should use the industry agreed Good Management Practices or other appropriate farm management programmes to minimize the risk of N or P/sediment losses to water. (iii) Specify that any management of existing farming activities that is necessary to manage N losses or P/sediment losses beyond adopting GMPs is done as part of catchment planning processes. (iv) Manage changes to land uses in the interim to avoid people shifting from relatively low to relatively high N loss land uses within Red, Orange and Lake Sensitive zones; and to ensure any change for land use in Blue or Green zones will not affect water quality in those catchments.		
PC5LWRP-2545 PC5LWRP-1880	Munro A R and K H Murchison JG and LM	Delete Policy 4.11 and replace with: 1. Farmers, mana whenua and the Council work in partnership to ensure all farming activities are operating at GMP or better. 2. Farming activities with higher potential nitrogen or phosphorus/ sediment losses are managed through a combination of nitrogen loss controls and Farm Environment Plans as appropriate to maintain water quality in the receiving environment, without unnecessarily restricting flexibility in farming activities or changes in land use. 3. Continual improvement in the knowledge of the state of water bodies within the region and the cause(s) of any deterioration in water quality by the Council, in partnership with the community, implementing a comprehensive water quality monitoring and investigations programme using data from scientific investigations and local knowledge. 4. Where appropriate, limiting the duration for which resource consents may be granted for activities which have high potential impacts on water quality in a catchment and a long duration consent may unduly compromise the ability to address water quality issues through catchment planning processes. 5. In Lake Sensitive Zones, there is no deterioration in water quality as a result of the discharge of contaminants or nitrogen or phosphorus/ sediment losses from land uses in the catchment. 6. In Red and Orange Nutrient Allocation Zones: i) There is no further deterioration of water quality as a result of changes in land use; and ii) Improvements in water quality result from reductions in nitrogen or phosphorus/ sediment losses as land uses operate at GMP or better. 7. In Blue and Green Nutrient Allocation Zones changes in land uses do not adversely affect existing water quality. 8. In Nutrient Allocation Zones where reductions in nitrogen losses from land uses are required beyond GMPs to achieve water quality outcomes, these reductions will be identified in sections 6 to 15 of this plan as part of the catchment planning and limit setting processes; and will be based on the following principles: i) Requiring those land uses which have the greatest losses making the most reductions, allowing for the effects of soil type and rainfall on nitrogen losses; and ii) Ensuring the pathways and timeframes for nitrogen reductions are reasonable, considering	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		any investment required in new infrastructure or any requirements to change land use.		
PC5LWRP-595	Egg Producers Federation and Poultry Industry Association	Delete Policy 4.11 and replace with: When determining a suitable duration of any resource consent granted under the region-wide rules in this Plan consideration shall be given to any plan change that introduces water quality or water quantity provisions into Sections 6-15 of this Plan.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-91 PC5LWRP-93 PC5LWRP-94 PC5LWRP-96 PC5LWRP-95 PC5LWRP-97 PC5LWRP-98 PC5LWRP-99	Hunter Downs Development Company Limited	Amend to include the following explanatory note: Policies 4.37 to 4.38E only apply to individual farming activities and farming enterprises. Irrigation Scheme nutrient losses are to be managed through policies 4.40 to 4.41D. OR [amend the definition of Nitrogen Baseline - refer to PC5LWRP-86] OR Amend to include an alternative to complying with nitrogen baseline as follows: 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),	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-607 PC5LWRP-608 PC5LWRP-609 PC5LWRP-610 PC5LWRP-611 PC5LWRP-613 PC5LWRP-615 PC5LWRP-616	Central Plains Water Ltd	Amend Policy 4.37 to include the following explanatory note: Policies 4.37 to 4.38E only apply to individual farming activities and farming enterprises. Irrigation Scheme nutrient losses are to be managed through policies 4.40 to 4.41D. [however the introductory sentence to the relief sought reads "Include an explanatory note advising that Policies 4.36 to 4.38E are not to apply to Irrigation Schemes"] OR Amend to include an alternative to complying with nitrogen baseline as follows: 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).		
PC5LWRP-647 PC5LWRP-649 PC5LWRP-648 PC5LWRP-650 PC5LWRP-651 PC5LWRP-652 PC5LWRP-653 PC5LWRP-654	Barrhill Chertsey Irrigation Scheme	Amend to include the following explanatory note: Policies 4.37 to 4.38E only apply to individual farming activities and farming enterprises. Irrigation Scheme nutrient losses are to be managed through policies 4.40 to 4.41D.		
PC5LWRP-175 PC5LWRP-176 PC5LWRP-177 PC5LWRP-178 PC5LWRP-179 PC5LWRP-180 PC5LWRP-181 PC5LWRP-182	Dairy Holdings Limited	Amend Policy 4.37 to include the following explanatory note: Policies 4.37 to 4.38E only apply to individual farming activities and farming enterprises. Irrigation Scheme nutrient losses are to be managed through policies 4.40 to 4.41D.		

Policy 4.11

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2075	Irrigation New Zealand Inc	Retain Policy 4.11 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-767	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain Policy 4.11 as notified.		
PC5LWRP-270	Ellesmere Sustainable Agriculture Inc	Delete the amendments to Policy 4.11.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2238	Federated Farmers of New Zealand	Delete Policy 4.11.		
PC5LWRP-480	Rangitata Diversion Race Management Limited	Delete Policy 4.11.		
PC5LWRP-974	Amuri Irrigation Co Limited	Delete Policy 4.11. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-1639	Ravensdown Limited	Delete Policy 4.11; OR Establish a set of criteria to be used to determine a duration of a consent while the Progressive Implementation Programme is being implemented using environmental outcomes; Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-395 PC5LWRP-605 PC5LWRP-173 PC5LWRP-89	Barrhill Chertsey Irrigation Scheme Central Plains Water Ltd Dairy Holdings Limited Hunter Downs Development Company Limited	Delete 4.11. OR If retained, amend as follows: The setting and attainment of catchment specific water quality and quantity outcomes and limits is enabled through ~~limiting the duration of any resource consent granted under the region-wide rules in this Plan to a period not exceeding five years past the expected notification date (as set out in the Council's Progressive Implementation Programme) of any~~ensuring that any consent granted under the region wide rules in this Plan includes appropriate review conditions to assist in meeting any catchment specific water quality and quantity outcomes introduced by way of future plan change ~~plan change that will introduce water quality or water quantity provisions~~ into Sections 6 – 15 of this Plan.		
PC5LWRP-139	Barton N	Delete Policy 4.11. OR Amend Policy 4.11 as follows: ~~Acknowledging the pivotal role of good management practices in the sustainable management of the Region's water bodies, good management practice will be codified and introduced into this Plan by way of a plan change on or before 30 October 2016.~~ The setting and attainment of catchment specific water quality and quantity outcomes and limits is enabled through ~~limiting the duration of any resource consent granted under the region-wide rules in this Plan to a period not exceeding five years past the expected notification date (as set out in the Council's Progressive Implementation Programme) of any~~ ensuring that any consent granted under the region wide rules in this Plan includes appropriate review conditions to assist in meeting any		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		catchment specific water quality and quantity outcomes introduced by way of future plan change~~plan change that will introduce water quality or water quantity provisions~~ into Sections 6 – 15 of this Plan.		
PC5LWRP-1795	Forest and Bird NZ	Amend Policy 4.11 to include the expected notification dates.	Reject	This information is available from the Council.
PC5LWRP-753	Purata Farming Ltd	Amend Policy 4.11 to make available the Progressive Implementation Programme, and streamline consent processing to limit costs on consent applicants.	Reject	The Progressive Implementation Programme is publicly available on the Council website. Consent processing is outside the scope of PC5.
PC5LWRP-1249	Fertiliser Association of New Zealand	Amend Policy 4.11 to extend consents to at least 10 to 15 years past the expected notification any plan change that will introduce water quality or water quantity provisions into sections 6-15.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1585	Horticulture New Zealand	Amend Policy 4.11 to provide for resource consents for 10 years where the expected notification date as set out in the Council's Progressive Implementations Programme is not met.		
PC5LWRP-834	Opuha Water Limited	Amend Policy 4.11 to include the following: (b) Allowing a longer duration where the resource consent includes conditions that enable a review of the resource consent under section 128(1)(a)(iii) of the RMA when a subregional section of the Plan has been made operative. Or words to similar effect.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1074	Fonterra Co-operative Group Ltd	Amend Policy 4.11 as follows: The setting and attainment of catchment water and quality outcomes and limits is enabled through limiting the duration of any resource consent granted under the region-wide rules in this Plan to a period not exceeding: five years in the Red or Orange; or 15 years in the Green or Light Blue zones past the expected notification date … And make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-225	DairyNZ	Amend Policy 4.11 as follows: The setting and attainment of catchment specific water quality and quantity outcomes and limits is enabled through limiting the duration of any resource consent granted under the region-wide rules in this Plan to a period not exceeding : • five years in the Red, Orange, or Blue zones; or • 15 years in the Green Zone past the expected notification date (as set out in the Council's Progressive Implementation Programme) of any plan change that will introduce water quality or water quantity provisions into Sections 6 – 15 of this Plan. Exceptions will be made where the consent application is able to demonstrate significant environmental benefit and a requirement for a longer period of consent in order to realise that benefit. Or words to similar effect.		

Policy 4.24

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2840	McLean G and M	Retain Policy 4.24.	Accept	We agree that retaining the existing policy is appropriate.
PC5LWRP-2871	Forrester J and R	Retain Policy 4.24.		
PC5LWRP-2808	Sloss K	Retain Policy 4.24.		
PC5LWRP-2909	Rangatahi Downs Land Trust	Retain Policy 4.24.		
PC5LWRP-2891	Forrester K	Retain Policy 4.24.		
PC5LWRP-1796	Forest and Bird NZ	Amend Policy 4.24 to delete PC5 amendments.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Policy 4.34

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1250	Fertiliser Association of New Zealand	Retain Policy 4.34 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1797	Forest and Bird NZ	Retain Policy 4.34 as notified.		
PC5LWRP-1647	Ravensdown Limited	Retain Policy 4.34 as notified.		
PC5LWRP-2839	McLean G and M	Delete Policy 4.34.	Reject	The deletion requested would unjustifiably weaken the LWRP and reduce its effectiveness.
PC5LWRP-2870	Forrester J and R	Delete Policy 4.34.		
PC5LWRP-2890	Forrester K	Delete Policy 4.34.		
PC5LWRP-2908	Rangatahi Downs Land Trust	Delete Policy 4.34.		
PC5LWRP-2807	Sloss K	Delete Policy 4.34.		
PC5LWRP-2789	Maungatahi Farm Limited	Delete Policy 4.34.		
PC5LWRP-2944	Munro A R and K H	Delete Policy 4.34.		
PC5LWRP-2927	Murchison JG and LM	Delete Policy 4.34.		
PC5LWRP-1466	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.34, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2230	Hoban J K W	Delete Policy 4.34 and replace with policies which: (i) Recognize the need for farmers to retain flexibility in their land uses to provide for their economic well-being and the economic well-being of New Zealand, and to ensure any regime provides for flexibility in land uses within limits for N loss that are appropriate considering both the need for farmers to make reasonable use of their interests in their land, and the sensitivity of the receiving environment. (ii) Promote that all farming activities should use the industry agreed Good Management Practices or other appropriate farm management programmes to minimize the risk of N or P/sediment losses to water. (iii) Specify that any management of existing farming activities that is necessary to manage N losses or P/sediment losses beyond adopting GMPs is done as part of catchment planning processes. However Plan Change 5 should be sending a signal that those catchment process but should follow a principle that any management of N or P/sediment losses should be commensurate with the amount of N or sediment/P an activity is contributing to the problem; and should consider both the sensitivity of the receiving environment and appropriate timeframes for people to adjust their land uses or invest in additional infrastructure where necessary. (iv) To manage changes to land uses in the interim to avoid people shifting from relatively low to relatively high N loss land uses within Red, Orange and Lake Sensitive zones; and to ensure any change for land use in Blue or Green zones will not affect water quality in those catchments.		
PC5LWRP-523	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.34 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-1440A	Beef and Lamb New Zealand Ltd	Amend Policy 4.34 a) raising awareness of the nutrient losses from all land uses ~~by requiring monitoring and record keeping of modelled nutrient loss;~~	Reject	The submission is outside the scope of Plan Change 5 as no amendment is proposed by the plan change to clauses (a) or (b) of the policy
PC5LWRP-2244A	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.34 (a) raising awareness of the nutrient losses from all land uses ~~by requiring monitoring and record keeping of modelled nutrient loss;~~		
PC5LWRP-2076	Irrigation New Zealand Inc	Amend Policy 4.34 as follows: (a) …record-keeping of ~~modelled~~ nutrient losses		
PC5LWRP-1440B	Beef and Lamb New Zealand Ltd	Amend Policy 4.34 (b) farming activities that have nutrient losses operating at ~~g~~Good Management ~~p~~ Practice or better; and		
PC5LWRP-2244B	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.34 (b) farming activities that have nutrient losses operating at ~~g~~Good Management ~~p~~Practice or better; and		
PC5LWRP-2076B	Irrigation New Zealand Inc	Amend Policy 4.34 (b) ~~farming activities that have nutrient losses operating at good practice or better~~the		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		implementation of Good Management Practices; and		
PC5LWRP-1586	Horticulture New Zealand	Amend Policy 4.34 (b) by changing 'good practice' to 'good management practice';		
PC5LWRP-758	Purata Farming Ltd	Amend Policy 4.34(c) as follows: (c) requiring the provision of information on Good Management Practice nutrient loss from farming activities to enable better decision-making.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2076C	Irrigation New Zealand Inc	Amend Policy 4.34 (c) requiring the provision of ~~modelled~~ nutrient loss from irrigation schemes, farming enterprises and farming activities to enable better decision making.		
PC5LWRP-1440C	Beef and Lamb New Zealand Ltd	Amend Policy 4.34 (c) requiring the provision of information on modelled nutrient loss from farming activities operating at Good Management Practice to enable better decision-making.	Accept in part	In response to this and other submissions we recommend an amendment to reinstate the word 'modelled' for the reasons in the Section 42A Report.
PC5LWRP-2244C	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.34 (c) requiring the provision of information on modelled nutrient loss from farming activities operating at Good Management Practice to enable better decision-making.		
PC5LWRP-2240	Federated Farmers of New Zealand	Amend Policy 4.34(c) as follows: (c) requiring the provision of information on estimated nutrient loss from farming activities to enable better decision-making. OR Retain the original wording.	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-228	DairyNZ	Amend Policy 4.34(c) as follows: (c) requiring the provision of information on estimated nutrient loss from farming activities to enable better decision-making. Or words to similar effect. OR Delete proposed PC5 amendment to Policy 4.34(c).		
PC5LWRP-691	North Canterbury Fish and Game & SI Fish and Game	Amend Policy 4.34 to include a new clause (d) as follows: (d) identify where OVERSEER® assumed practices are or were not being met, and quantify against comparative improvements or projected improvements in GMP nutrient reductions. AND further or alternative relief to the effect of that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Policy 4.36

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-692	North Canterbury Fish and Game & SI Fish and Game	Retain Policy 4.36 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2840A	McLean G and M	Delete policy 4.36.	Reject	The deletion requested would unjustifiably weaken the LWRP and reduce its effectiveness.
PC5LWRP-2871A	Forrester J and R	Delete policy 4.36.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2808A	Sloss K	Delete policy 4.36.		
PC5LWRP-2909A	Rangatahi Downs Land Trust	Delete policy 4.36.		
PC5LWRP-2891A	Forrester K	Delete policy 4.36.		
PC5LWRP-2945	Munro A R and K H	Delete Policy 4.36.		
PC5LWRP-2928	Murchison JG and LM	Delete Policy 4.36.		
PC5LWRP-2833	Hoban J K W	Delete Policy 4.36.		
PC5LWRP-2790	Maungatahi Farm Limited	Delete Policy 4.36.		
PC5LWRP-524	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.36 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-596	Rangitata Diversion Race Management Limited	Amend Policy 4.36 to achieve consistent use of the terms 'GMP Loss Rate' and 'Baseline GMP loss Rate', and highlight the interconnection of this policy with following 'zone related' policies.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-978A	Amuri Irrigation Co Limited	Amend Policy 4.36 to achieve consistent use of the terms 'GMP Loss Rate' and 'Baseline GMP loss Rate', and highlight the interconnection of this policy with following 'zone related' policies.		
PC5LWRP-1477	Harrison P	Retain Policy 4.36(a) as notified.	Accept	We agree that retaining the existing clause in this policy would be appropriate.
PC5LWRP-237	DairyNZ	Retain Policy 4.36(a) as notified.		
PC5LWRP-1736A	Ravensdown Limited	Retain Policy 4.36, clause (a) as notified.		
PC5LWRP-1588	Horticulture New Zealand	Delete Policy 4.36(a). OR Amend Policy 4.36(a) by changing 'good practice' to 'good management practice'. And make any consequential amendments.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-174	Dairy Holdings Limited	Amend Policy 4.36(a) to refer to "....good management practices".		
PC5LWRP-788	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Policy 4.36(a) as follows: (a) All farming activities minimising nutrient losses through the implementation of ~~good practice~~ Good Management Practice;		
PC5LWRP-1251	Fertiliser Association of New Zealand	Amend Policy 4.36(a) as follows: (a) all farming activities minimising nutrient losses through the implementation of good management practice		
PC5LWRP-1444B	Beef and Lamb New Zealand Ltd	Amend Policy 4.36 as follows: (a) all farming activities minimising nutrient losses through the implementation of ~~g~~Good Management ~~p~~Practice		
PC5LWRP-2246A	Canterbury/West Coast & South	Amend Policy 4.36 as follows: (a) all farming activities minimising nutrient losses through the implementation of ~~g~~Good		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Canterbury/North Otago Branches NZ Deer Farmers Association	Management ~~p~~Practice		
PC5LWRP-2081	Irrigation New Zealand Inc	Amend Policy 4.36 as follows: (a) …through the implementation of good management practices		
PC5LWRP-237A	DairyNZ	Retain Policy 4.36(b) as notified.	Accept	We agree that retaining the existing clause in this policy would be appropriate.
PC5LWRP-1588A	Horticulture New Zealand	Retain clause (b) as notified.		
PC5LWRP-1251B	Fertiliser Association of New Zealand	Retain Policy 4.36(b) as notified.		
PC5LWRP-2242	Federated Farmers of New Zealand	Delete Policy 4.36(b).	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2081A	Irrigation New Zealand Inc	Delete Policy 4.36(b).		
PC5LWRP-1444C	Beef and Lamb New Zealand Ltd	Amend Policy 4.36(b) as follows: (b) all ~~p~~Permitted ~~farming a~~Activities under the CLWRP , on properties greater than 10 hectares ~~preparing and~~ implementing Good Management Practice through preparation of a Management Plan in accordance with Schedule 7A.		
PC5LWRP-2246B	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.36(b) as follows: (b) all ~~p~~Permitted ~~farming a~~Activities under the CLWRP , on properties greater than 10 hectares ~~preparing and~~ implementing Good Management Practice through preparation of a Management Plan in accordance with Schedule 7A.		
PC5LWRP-777	Purata Farming Ltd	Amend Policy 4.36(b) by replacing the term 'management plans' with Good Management Practice.		
PC5LWRP-1798	Forest and Bird NZ	Delete Policy 4.36(b) unless changes are made to schedule 7A [PC5LWRP-1847].		
PC5LWRP-1251A	Fertiliser Association of New Zealand	Delete Policy 4.36(bb).		
PC5LWRP-1444D	Beef and Lamb New Zealand Ltd	Amend Policy 4.36(bb) (bb) farming activities with the potential for more significant nutrient losses, managing their nitrogen loss in accordance with agreed Good Management Practices and the Good Management Practices Loss Rates and being subject to resource consent and being subject to a resource consent process; and …		
PC5LWRP-2246C	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.36(bb) (bb) farming activities with the potential for more significant nutrient losses, managing their nitrogen loss in accordance with agreed Good Management Practices and the Good Management Practices Loss Rates and being subject to resource consent and being subject to a resource consent process; and …		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2081C	Irrigation New Zealand Inc	Amend Policy 4.36(bb) (bb) …managing their nitrogen loss in accordance with Baseline Good Management Loss Rates, or a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period, and being subject to a resource consent process; and...		
PC5LWRP-1798A	Forest and Bird NZ	Amend Policy 4.36(bb) as follows: 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, subject to conditions that ensure water quality targets are achieved; AND Insert the following: 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		
PC5LWRP-1209A	Canterbury District Health Board	Amend Policy 4.36 (bb) as follows: Expand [on the word] 'significant' in clause (bb).	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-583	Rangitata Diversion Race Management Limited	Amend Policy 4.36(bb) as follows: farming activities ~~with the potential for more significant nutrient losses~~that require a resource consent to discharge nutrients to ground or surface water , managing, over time , … with either the Baseline Good Management Practice Loss Rate or the Good Management Practice Loss Rate ~~sand being subject to a resource consent process~~(as set out in policies 4.37 to 4.38AA, and Policy 4.38A); … AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-978	Amuri Irrigation Co Limited	Amend Policy 4.36(bb) as follows: farming activities ~~with the potential for more significant nutrient losses~~ that require a resource consent to discharge nutrients to ground or surface water , managing , over time , their nitrogen loss in accordance with either the Baseline Good Management Practice Loss Rate or the Good Management Practice Loss Rate ~~s and being subject to a resource consent process~~ (as set out in policies 4.37 to 4.38AA, and Policy 4.38A); … AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	
PC5LWRP-237B	DairyNZ	Amend Policy 4.36 (bb) as follows: (bb) farming activities with the potential for more significant nutrient losses, managing their nitrogen loss in accordance with Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice and being subject to a resource consent process...	Accept in part	In response to this and other submissions are recommending the inclusion of new policies that provide, in limited circumstances for the calculation of an Equivalent Baseline GMP Loss Rate and Equivalent Good Management Practice Loss Rate.
PC5LWRP-1864	Fonterra Co-operative Group Ltd	Amend Policy 4.36 (bb) as follows: (bb) farming activities with the potential for ~~more~~ significant nutrient losses, managing their nitrogen loss in accordance with Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice and being subject to a resource consent process. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1736	Ravensdown Limited	1) If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 4.36 as follows: (bb) farming activities that do not meet the permitted activity standards~~with the potential for more significant nutrient losses,~~ manage~~ing~~ their nitrogen losses in general accordance with the Good Management Practices*~~Loss Rates~~ and ~~being subject to~~as part of a resource consent process; and * means the Industry-agreed GMP document. Or such other or alternative wording which would properly address the concerns raised.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-646	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.36 to include a new clause as follows: (bbb) enable irrigation schemes and principal water suppliers to manage nutrient loss on the properties supplied with water through use of the Farm Portal or other mechanisms included in a resource consent for the purpose of controlling nutrient losses.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-606	Central Plains Water Ltd	Amend Policy 4.36 to include a new clause as follows: (bbb) enable irrigation schemes and principal water suppliers to manage nutrient loss on the properties supplied with water through use of the Farm Portal or other mechanisms included in a resource consent for the purpose of controlling nutrient losses.		
PC5LWRP-90	Hunter Downs Development Company Limited	Amend Policy 4.36 to include a new clause as follows: (bbb) enable irrigation schemes and principal water suppliers to manage nutrient loss on the properties supplied with water through use of the Farm Portal or other mechanisms included in a resource consent for the purpose of controlling nutrient losses.		
PC5LWRP-1736B	Ravensdown Limited	Retain Policy 4.36, clause (c) as notified.	Accept	We agree that retaining the existing clause in this policy is appropriate.
PC5LWRP-1209	Canterbury District Health Board	Amend Policy 4.36 (c) as follows: Amend clause (c) to read: "(c) ~~encouraging~~requiring industry and irrigation scheme-based initiatives to improve land and water use practices for farming activities, reduce nutrient loss and nutrient discharges, and facilitate land use consenting, including irrigation scheme-wide initiatives, reporting and auditing of their constituent farms."	Reject	The request is outside the scope of Plan Change 5 as not amendment to this clause in this policy is proposed by the plan change.
PC5LWRP-1588B	Horticulture New Zealand	Amend Policy 4.36 (c) as follows: Amend clause (c) by deleting '~~Good Management Practice Loss Rates'~~ and replace with ' Good Management Practices';		
PC5LWRP-2242A	Federated Farmers of New Zealand	Amend Policy 4.36 (c) as follows: …. and facilitate land use consenting . ~~, including irrigation scheme-wide initiatives, reporting and auditing of their constituent farms~~.		
PC5LWRP-1261	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.36, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1469	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.36, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones,	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		except for irrigation and dairy effluent management.		

Policy 4.37

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-693	North Canterbury Fish and Game & SI Fish and Game	Retain Policy 4.37 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2842	McLean G and M	Delete Policy 4.37.	Reject	The deletion requested would unjustifiably weaken the LWRP and reduce its effectiveness.
PC5LWRP-2872	Forrester J and R	Delete Policy 4.37.		
PC5LWRP-2809	Sloss K	Delete Policy 4.37.		
PC5LWRP-2910	Rangatahi Downs Land Trust	Delete Policy 4.37.		
PC5LWRP-2892	Forrester K	Delete Policy 4.37.		
PC5LWRP-2834	Hoban J K W	Delete Policy 4.37.		
PC5LWRP-2791	Maungatahi Farm Limited	Delete Policy 4.37.		
PC5LWRP-2946	Munro A R and K H	Delete Policy 4.37.		
PC5LWRP-2929	Murchison JG and LM	Delete Policy 4.37.		
PC5LWRP-271	Ellesmere Sustainable Agriculture Inc	Delete the amendments to Policy 4.37.		
PC5LWRP-525	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.37 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1028	Dave Ashby Rural Consultants Limited	Amend Policy 4.37 to exclude reference to Baseline GMP Loss Rate.		
PC5LWRP-1260	Fertiliser Association of New Zealand	Amend Policy 4.37 to give direction to seek additional scrutiny to resource consent applications that exceed Baseline GMP Loss Rate or exceed GMP Loss Rate.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1799	Forest and Bird NZ	Amend Policy 4.37 to remove the reference to Policy 4.38A and include a clause recognising that reductions beyond GMP may be required to achieve freshwater objectives.	Reject	Further reductions beyond GMP is a matter to be considered in the development of plan changes that introduce provisions into sub-region sections of the LWRP.
PC5LWRP-100	Hunter Downs Development Company Limited	Amend to delete the restrictions on intensification in orange and blue and green zones, and allow for intensification up to good management practice loss rates.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-987	Amuri Irrigation Co Limited	Amend Policy 4.37 to include an appropriate transition period to achieve both the GMP Loss Rate and the Baseline GMP Loss Rate; AND make any similar and/or consequential amendments that stem from the changes and/or	Reject	Provisions in Plan Change 5 already adequately address these matters.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		additions.		
PC5LWRP-614	Rangitata Diversion Race Management Limited	Amend Policy 4.37 to include an appropriate transition period to achieve both the GMP Loss Rate and the Baseline GMP Loss Rate; And make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-143	Barton N	Amend Policy 4.37 to incorporate the amended definition of the 'Baseline GMP Loss Rate', OR add the following: A water permit was granted prior to 13 February 2016 and the nitrogen loss was permitted by the LWRP when the water permit was granted (including any renewal or replacement of that resource consent after 13 February 2016). Or words to similar effect.	Reject	We are not persuaded that it would be more effective and a reasonably practicable option on a region-wide basis.
PC5LWRP-2252	Federated Farmers of New Zealand	Amend Policy 4.37 to treat Lake Zones similarly to Red Zones i.e. allow an N discharge of up to 10 kg/ha/year, as a permitted activity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See also the separate narrative on this point in the main text of this report.
PC5LWRP-2095	Irrigation New Zealand Inc	Amend Policy 4.37 as follows: 4.37 Freshwater quality is improved within the Red, Lake and Orange zones by:	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1214	Canterbury District Health Board	Amend Policy 4.37(a) as follows: "(a) ~~avoiding the~~ not granting [~~of~~]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; .."	Reject	The proposed amendment would not alter the effect of the policy.
PC5LWRP-431	Ballance Agri-Nutrients Limited	Amend Policy 4.37(a) as follows: ~~avoiding~~Provide for the granting of ~~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, and where the application is supported with a robust analysis demonstrating both the process and timeframes to achieve the Baseline GMP Loss Rate;...	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1739	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 4.37(a) as follows: "(a) avoiding the granting of any resource consent ~~that~~ will not allow the nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate, except where Policy 4.38A applies; and..." OR such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-1980	Genesis Energy Limited	Amend Policy 4.37(a) as follows: (a) avoiding the granting of any resource consent that will allow the nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate, or the Nitrogen Baseline, whichever is the lesser, except where Policy 4.38A applies... Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-75	Meridian Energy Limited	Amend Policy 4.37(a) as follows: (a) avoiding the granting of any resource consent that will allow the nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate, or the Nitrogen Baseline, whichever is the lesser, except where Policy 4.38A applies... Or words to similar effect.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1260A	Fertiliser Association of New Zealand	Amend Policy 4.37(a) (a) ~~avoiding~~requiring additional scrutiny following clear decision guidelines for applications for the granting of 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; and		We are not persuaded that a reference to clear decision guidelines would be an improvement because it is unclear what the guidelines would say and where they would reside.
PC5LWRP-716A	Fonterra Co-operative Group Ltd	Amend Policy 4.37(a) as follows: (a) avoiding the granting of any resource consent that will allow the nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate or, alternatively, the Loss Rate Assessed as Baseline GMP except where Policy 4.38A applies; and AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested by the insertion of new policies that provide for Equivalent Baseline GMP Loss Rates and Good Management Practice Loss Rates.
PC5LWRP-239A	DairyNZ	Amend Policy 4.37(a) as follows: (a) avoiding the granting of any resource consent that will allow the nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate or, alternatively, the Loss Rate Assessed as Baseline GMP except where Policy 4.38A applies; and		
PC5LWRP-2095A	Irrigation New Zealand Inc	Amend Policy 4.37(a) as follows: (a) avoiding the granting of any resource consent that will allow nitrogen losses from a farming activity to exceed the Baseline GMP Loss Rate or a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period, except where Policy 4.38A applies by:	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1739A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 4.37(b) to: • include an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • include an additional formal process for reviewing and moderating inaccurate portal results; • embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 to accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1453A	Beef and Lamb New Zealand Ltd	Amend Policy 4.37(b) as follows: (b) including on any resource consent granted for the farming activity, conditions that: (i) require the application of Good Management Practices across the whole property (ii) limit the nitrogen loss…	Reject	We do not consider that the requested amendment would be appropriate or necessary in all circumstances.
PC5LWRP-1260B	Fertiliser Association of New Zealand	Amend Policy 4.37(b) as follows: (b) where practicable based on clear decision guidelines, include~~ing~~ on any resource consent granted for the use of land for a farming activity, conditions that:…	Reject	We are not persuaded that a reference to clear decision guidelines would be an improvement because it is unclear what the guidelines would say and where they would reside.
PC5LWRP-239B	DairyNZ	Amend Policy 4.37(b) as follows: (b) including on any resource consent granted for the use of land for a farming activity as a controlled activity or restricted discretionary activity , conditions that:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1453B	Beef and Lamb New Zealand Ltd	Amend Policy 4.37(b) by adding a new subclause: require the application of Good Management Practice across the whole property	Reject	We do not consider that the requested amendment would be appropriate or necessary in all circumstances.
PC5LWRP-2247B	Canterbury/West Coast & South	Amend Policy 4.37 (b) by adding a new subclause require the application of Good Management Practice across the whole property		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Canterbury/North Otago Branches NZ Deer Farmers Association			
PC5LWRP-716B	Fonterra Co-operative Group Ltd	Amend Policy 4.37(b)(i) as follows: (i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested by the insertion of new policies that provide for Equivalent Baseline GMP Loss Rates and Good Management Practice Loss Rates.
PC5LWRP-239C	DairyNZ	Amend Policy 4.37(b)(i) as follows: (i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and		
PC5LWRP-2095C	Irrigation New Zealand Inc	Amend Policy 4.37(b)(i) as follows: (i) limit the nitrogen loss calculation for the farming activity the Baseline GMP Loss rate or a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-716C	Fonterra Co-operative Group Ltd	Amend Policy 4.37(b)(ii) as follows: (ii) require activities to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstances where that Good Management Practice Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate [or] Loss Rate Assessed as Baseline GMP; and	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested by the insertion of new policies that provide for Equivalent Baseline GMP Loss Rates and Good Management Practice Loss Rates.
PC5LWRP-239D	DairyNZ	Amend Policy 4.37(b)(ii) as follows: (ii) require activities to operate at or below the Good Management Practice Loss Rate, in any circumstances where that Good Management Practice Rate is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and Or words to similar effect.		
PC5LWRP-2095D	Irrigation New Zealand Inc	Amend Policy 4.37(b)(ii) as follows: (ii) require farming activities 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~~ their Baseline GMP Loss rate or a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period.	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested by the insertion of new policies that provide for Equivalent Baseline GMP Loss Rates and Good Management Practice Loss Rates.
PC5LWRP-1260C	Fertiliser Association of New Zealand	Retain Policy 4.37(c).	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1453C	Beef and Lamb New Zealand Ltd	Amend Policy 4.37(c) as follows ...(c) requiring the adoption of Good Management Practice through a Farm Management Plan as part of an application for resource consent to use land for a farming activity, and requiring that Farm Management Plan to: …	Reject	Provisions of Plan Change 5 relating to Schedules 7 and 7A already address these matters.
PC5LWRP-2247	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.37(c) as follows: (c) requiring the adoption of Good Management Practice through a Farm Management Plan as part of an application for resource consent to use land for a farming activity, and requiring that Farm Management Plan to: …		
PC5LWRP-1739B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are	Accept	In response to this and other submissions we recommend an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		resolved: Amend Policy 4.37(c) as follows: requiring a Farm Environment Plan as part of any application for resource consent to use land for a farming activity, and requiring that Farm Environment Plan to be prepared in accordance with ~~:~~ ~~(i) describe the specific on-farm actions that will be undertaken (and the timeframe within which these actions will be undertaken) to implement the Good Management Practices; and~~ ~~(ii) provide an explanation of how these on-farm actions will ensure progress towards the attainment of the management objectives and targets in~~ Schedule 7 of this plan. OR such other or alternative wording which would properly address the concerns raised.		amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1453D	Beef and Lamb New Zealand Ltd	Amend Policy 4.37(c)(ii) as follows: (ii) provide an explanation of how ~~these~~ on-farm actions will ensure progress towards the attainment of the objectives and targets for the property in support of GMP. ~~in Schedule 7 of this plan.~~	Reject	In response to other submission points we recommend that this clause is omitted.
PC5LWRP-2247D	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.37(c)(ii) as follows: (ii) provide an explanation of how ~~these~~ on-farm actions will ensure progress towards the attainment of the objectives and targets for the property in support of GMP. ~~in Schedule 7 of this plan.~~		
PC5LWRP-792	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Policy 4.37 to insert new clause ba as follows: (ba) Where, as at 13 February 2016, a 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: (i) 15% by 1 January 2025 (ii) 25% by 1 January 2030 (iii) 35% by 1 January 2035 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.	Reject	See Chapter 11 of the main text of this report.
PC5LWRP-239E	DairyNZ	Amend Policy 4.37 as follows: (ba) including on any resource consent granted for the use of land for a farming activity as a discretionary activity, conditions that: (i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Loss Rate Assessed as Baseline GMP; and (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	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and we recommend amendments accordingly. See also Chapter 9 of this report.
PC5LWRP-1273	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.36, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-239	DairyNZ	Amend Policy 4.37 as follows if the relief sought in submission points PC5LWRP239A-239E is	Accept in part	These submissions request provision in Plan Change 5 for an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		not accepted: 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; OR 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.		alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.

Policy 4.38

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1478	Harrison P	Retain Policy 4.38 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-272	Ellesmere Sustainable Agriculture Inc	Delete the amendments to Policy 4.38, and make any consequential amendments.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2843	McLean G and M	Delete Policy 4.38.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness.
PC5LWRP-2873	Forrester J and R	Delete Policy 4.38.		
PC5LWRP-2810	Sloss K	Delete Policy 4.38.		
PC5LWRP-2911	Rangatahi Downs Land Trust	Delete Policy 4.38.		
PC5LWRP-2893	Forrester K	Delete Policy 4.38.		
PC5LWRP-2101	Irrigation New Zealand Inc	Delete Policy 4.38.		
PC5LWRP-2792	Maungatahi Farm Limited	Delete Policy 4.38.		
PC5LWRP-2835	Hoban J K W	Delete Policy 4.38.		
PC5LWRP-2947	Munro A R and K H	Delete Policy 4.38.		
PC5LWRP-2926	Murchison JG and LM	Delete Policy 4.38.		
PC5LWRP-526	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38 to exclude poultry farming OR such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-103	Hunter Downs Development Company Limited	Amend to delete the restrictions on intensification in orange and blue and green zones, and allow for intensification up to good management practice loss rates.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1034	Dave Ashby Rural Consultants Limited	Amend Policy 4.38 to exclude reference to Baseline GMP Loss Rate.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-988	Amuri Irrigation Co Limited	Amend Policy 4.38 to include an appropriate transition period to achieve both the GMP Loss Rate and the Baseline GMP Loss Rate; AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-619	Rangitata Diversion Race Management Limited	Amend Policy 4.38 to include an appropriate transition period to achieve both the GMP Loss Rate and the Baseline GMP Loss Rate; AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-725A	Fonterra Co-operative Group Ltd	Amend Policy 4.38 as follows: Freshwater quality is improved [~~*maintained*~~] within the Lake Zone and Orange Nutrient Allocation Zone by:	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-247	DairyNZ	Amend Policy 4.38 as follows: Freshwater quality is [~~*maintained*~~ *improved within the Lake Zone and*] Orange Nutrient Allocation Zone by: Or words to similar effect.		
PC5LWRP-1270A	Fertiliser Association of New Zealand	Amend Policy 4.38(a) as follows: (a) requiring additional scrutiny following clear decision guidelines for resource consent applications seeking to exceed the lesser of, ~~restricting~~ nitrogen losses from farming activities ~~to the lesser~~ of the Baseline GMP Loss Rate or the Good Management Practice Loss Rate, except where Policy 4.38A applies; and		We are not persuaded that a reference to clear decision guidelines would be an improvement because it is unclear what the guidelines would say and where they would reside.
PC5LWRP-2254	Federated Farmers of New Zealand	Amend Policy 4.38(a) to allow for an increase of 5 kg N/ha/year above the Baseline GMP Loss Rate (with restricted discretionary activity status).	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-725B	Fonterra Co-operative Group Ltd	Amend Policy 4.38(a) as follows: (a) Restricting nitrogen losses from farming activities to the lesser of the Baseline GMP Loss Rate or the Loss Rate Assessed as Baseline GMP and~~or~~ the Good Management Loss Rate except where Policy 4.38A applies; and	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-247A	DairyNZ	Amend Policy 4.38(a) as follows: (a) Restricting nitrogen losses from farming activities to ~~the lesser of~~ either the Baseline GMP Loss Rate or the Loss Rate Assessed as Baseline GMP and ~~or~~ the Good Management Loss Rate except where Policy 4.38A applies; and		
PC5LWRP-1800	Forest and Bird NZ	Amend Policy 4.38(a) to remove the reference to Policy 4.38A	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1270	Fertiliser Association of New Zealand	Amend Policy 4.38(b) as follows: (b) where practicable based on clear decision guidelines, include~~ing~~ on any resource consent granted for the use of land for a farming activity, conditions that:…	Reject	We are not persuaded that a reference to clear decision guidelines would be an improvement because it is unclear what the guidelines would say and where they would reside.
PC5LWRP-247B	DairyNZ	Amend Policy 4.38(b) as follows: (b) including on any resource consent granted for the use of land for a farming activity as a controlled activity or restricted discretionary activity, conditions that:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				instruments.
PC5LWRP-1740A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: 1) Amend Policy 4.38 clause (b) to: • include an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; and • include an additional formal process for reviewing and moderating inaccurate portal results; and • c) embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-725C	Fonterra Co-operative Group Ltd	Amend Policy 4.38(b)(i) as follows: (i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or, alternatively, the Loss Rate Assessed as Baseline GMP ; and		
PC5LWRP-725D	Fonterra Co-operative Group Ltd	Amend Policy 4.38(b)(ii) as follows: (ii) require activities to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstances where that Good Management Practice Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate [or] Loss Rate Loss Rate Assessed as Baseline GMP ; and		
PC5LWRP-247C	DairyNZ	Amend Policy 4.38 as follows: (ba) including on any resource consent granted for the use of land for a farming activity as a discretionary activity, conditions that: (i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Loss Rate Assessed as Baseline GMP; and		
PC5LWRP-247D	DairyNZ	Amend Policy 4.38 as follows: (ba) including on any resource consent granted for the use of land for a farming activity as a discretionary activity, conditions that: (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 Baseline GMP Loss Rate; and		
PC5LWRP-1800A	Forest and Bird NZ	Amend Policy 4.38 by including a clause as follows: (ba) avoid and mitigate other adverse effects.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-812	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Policy 4.38 to insert a new clause [ba] as follows: (ba) Where, as at 13 February 2016, a property's nitrogen loss is greater than 15kgs per hectare per annum 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: (i) 15% by 1 January 2025 (ii) 25% by 1 January 2030 (iii) 35% by 1 January 2035 provided that these nitrogen loss reductions do not require the property's nitrogen loss calculation to reduce below the permitted nitrogen baseline.	Reject	See Chapter 10 of this report.
PC5LWRP-1270B	Fertiliser Association of New Zealand	Retain Policy 4.38(c).	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				provisions, we recommend that they are retained as notified.
PC5LWRP-1740B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 4.38 clause (c) as follows: (c) requiring a Farm Environment Plan as part of any application for resource consent to use land for a farming activity, and requiring that Farm Environment Plan to be prepared in accordance with~~:~~ ~~(i) describe the specific on-farm actions that will be undertaken (and the timeframe within which these actions will be undertaken) to implement the Good Management Practices; and~~ ~~(ii) provide an explanation of how these on-farm actions will ensure progress towards the attainment of the management objectives and targets in~~ Schedule 7 of this plan. OR such other or alternative wording which would properly address the concerns raised.	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2248	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.38(c)(ii) as follows: (c)(ii) provide an explanation of how ~~these~~ on-farm actions will ensure progress towards the attainment of the objectives and targets for the property in support of GMP. ~~in Schedule 7 of this plan.~~	Reject	In response to other submission points we recommend that this clause is omitted.
PC5LWRP-1489	Beef and Lamb New Zealand Ltd	Amend Policy 4.38(c)(ii) as follows: (c)(ii) provide an explanation of how these on-farm actions will ensure progress towards the attainment of the objectives and targets for the property in support of GMP. ~~in Schedule 7 of this plan.~~		
PC5LWRP-1275	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.38, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. Refer to Chapter 6 of this report.
PC5LWRP-146	Barton N	Amend Policy 4.38 to incorporate the amended definition of the 'Baseline GMP Loss Rate', OR Amend relevant policies to include an alternative pathway as follows: A water permit was granted prior to 13 February 2016 and the nitrogen loss was permitted by the LWRP when the water permit was granted (including any renewal or replacement of that resource consent after 13 February 2016). Or words to similar effect.	Reject	On the requested amendment to the policy, we are not persuaded that it would assist understanding of the intended operation of the policy. On the alternative requested amendment we are not persuaded that it would be more effective and a reasonably practicable option on a region-wide basis.

Policy 4.38AA

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2844	McLean G and M	Delete Policy 4.38AA.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness.
PC5LWRP-2874	Forrester J and R	Delete Policy 4.38AA.		
PC5LWRP-2811	Sloss K	Delete Policy 4.38AA.		
PC5LWRP-2912	Rangatahi Downs Land Trust	Delete Policy 4.38AA.		
PC5LWRP-2894	Forrester K	Delete Policy 4.38AA.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-273	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38AA.		
PC5LWRP-2793	Maungatahi Farm Limited	Delete Policy 4.38AA.		
PC5LWRP-2836	Hoban J K W	Delete Policy 4.38AA.		
PC5LWRP-2930	Murchison JG and LM	Delete Policy 4.38AA.		
PC5LWRP-2948	Munro A R and K H	Delete Policy 4.38AA.		
PC5LWRP-2519	Anderson D & K and Anderson B & M	Delete Policy 4.38AA and replace with policies that work with landowners in a catchment board model.		
PC5LWRP-2492	Holland D G	Delete Policy 4.38AA and replace with policies that work with landowners in a Catchment Board model.		
PC5LWRP-1470	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38AA, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.		
PC5LWRP-104	Hunter Downs Development Company Limited	Amend policy 4.38AA to delete the restrictions on intensification in orange and blue and green zones, and allow for intensification up to good management practice loss rates.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1186	Dave Ashby Rural Consultants Limited	Amend Policy 4.38AA to achieve that the provisions for Green or Light Blue zones outlined only apply in areas which are not up-gradient from or adjacent to areas zoned Red or Orange or adjacent to alpine rivers, and that nutrient losses from farming activities in these zones that are either up-gradient or adjacent to Red and Orange zones are constrained to the same extent as the adjacent zone.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-527	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38AA to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-1044	Dave Ashby Rural Consultants Limited	Amend Policy 4.38AA to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-990	Amuri Irrigation Co Limited	Amend Policy 4.38AA to include an appropriate transition period to achieve both the GMP Loss Rate and the Baseline GMP Loss Rate; AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Accept in part	Provisions in Plan Change 5 already address these matters.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-622	Rangitata Diversion Race Management Limited	Amend Policy 4.38AA to include an appropriate transition period to achieve both the GMP Loss Rate and the Baseline GMP Loss Rate; AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-147	Barton N	Amend Policy 4.38AA to incorporate the amended definition of the 'Baseline GMP Loss Rate', OR Amend relevant policies to include an alternative pathway as follows: A water permit was granted prior to 13 February 2016 and the nitrogen loss was permitted by the LWRP when the water permit was granted (including any renewal or replacement of that resource consent after 13 February 2016). Or words to similar effect.	Reject	We do not consider an amendment to the policy is appropriate or necessary.
PC5LWRP-1801	Forest and Bird NZ	Amend Policy 4.38AA to delete the parts of the policy which provide for a 5kg/ha/yr increase in nitrogen leaching.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-183A	Dairy Holdings Limited	Amend Policy 4.38AA(a) as follows: (a) limiting the discharge of nitrogen for new irrigation to a Baseline GMP Loss Rate determined through the Farm Portal assuming spray irrigation and the proposed irrigated land use, ~~(a) restricting increases in nitrogen loss from farming activities to no more than a total of 5kg/ha/yr above the Baseline GMP Loss Rate; and~~	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-253A	DairyNZ	Amend Policy 4.38AA(a) as follows: Freshwater quality is maintained within the Green and Light Blue Nutrient Allocation zones by: (a) restricting increases in nitrogen loss from farming activities as a permitted activity to no more than a total of 5kg/ha/yr above the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-726A	Fonterra Co-operative Group Ltd	Amend Policy 4.38AA(a) as follows: Freshwater quality is maintained within the Green and Light Blue Nutrient Allocation zones by: (a) restricting increases in nitrogen loss from farming activities as a permitted activity to no more than a total of 5kg/ha/yr above the Baseline GMP Loss Rate; and		
PC5LWRP-2102A	Irrigation New Zealand Inc	Delete 4.38AA(a) and replace with the following: Requiring a resource consent for a farming activity that increases its Baseline GMP Loss Rate or a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period,		
PC5LWRP-1276A	Fertiliser Association of New Zealand	Amend Policy 4.38AA(a) as follows (a) ~~restricting~~require additional scrutiny following clear decision guidelines for resource consent applications seeking to exceed increases in nitrogen loss from farming activities to more than a total of 5kg/ha/yr above the Baseline GMP Loss Rate; and	Reject	We are not persuaded that a reference to clear decision guidelines would be an improvement because it is unclear what the guidelines would say and where they would reside.
PC5LWRP-2102B	Irrigation New Zealand Inc	Delete Policy 4.38AA(b)	Reject	The omission of this clause of the policy would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-253B	DairyNZ	Delete Policy 4.38AA(b)		
PC5LWRP-726B	Fonterra Co-operative Group Ltd	Delete Policy 4.38AA(b)		
PC5LWRP-1801A	Forest and Bird NZ	Amend Policy 4.38AA to include a new clause: (ba) avoid and mitigate other adverse effects.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1741	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 4.38AA(b) as follows: (i) include an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; and (ii) include an additional formal process for reviewing and moderating inaccurate portal results; and (iii) embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1276B	Fertiliser Association of New Zealand	Amend Policy 4.38AA(b) as follows: (b) where practicable based on clear decision guidelines, includ~~ing~~ on any resource consent granted for the use of land for a farming activity, conditions that:	Reject	We are not persuaded that a reference to clear decision guidelines would be an improvement because it is unclear what the guidelines would say and where they would reside.
PC5LWRP-183C	Dairy Holdings Limited	Amend Policy 4.38AA(b)(i) as follows: (b) including on any resource consent granted for the use of land for a farming activity, conditions that: (i) limit the nitrogen loss calculation for the farming activity to a rate not exceeding: a. in the case of new irrigation, a Good Management Practice Loss Rate based on the proposed irrigated land use and spray irrigation with an with an efficiency of 80%; and b. in all other cases, a total of 5kg/ha/yr above the Baseline GMP Loss Rate; and	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-183E	Dairy Holdings Limited	Delete Policy 4.38AA(b)(ii).	Reject	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1276C	Fertiliser Association of New Zealand	Retain Policy 4.38AA(c).	Reject	In response to other submissions we are recommending that this clause be omitted.
PC5LWRP-2255	Federated Farmers of New Zealand	Delete Policy 4.38AA(c).	Accept	We agree that omission of this clause is appropriate.
PC5LWRP-2102C	Irrigation New Zealand Inc	Delete Policy 4.38AA(c).		
PC5LWRP-253	DairyNZ	Amend Policy 4.38AA(c) as follows: (c) ~~Not granting~~ Any resource consent to exceed the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP will be assessed against the impact granting that consent will have on the ability to maintain [~~*unless the application for resource consent demonstrates*~~] that water quality will be maintained; and	Reject	In response to other submissions we are recommending that clause (c) in its entirety is deleted.
PC5LWRP-726D	Fonterra Co-operative Group Ltd	Amend Policy 4.38AA(c) as follows: (c) Not granting any resource consent to exceed 5kg/ha/yr above the greater of the Baseline GMP Loss Rate and the Loss Rate Assessed as Baseline GMP unless the application for resource consent demonstrates that water quality will be maintained; and		
PC5LWRP-183F	Dairy Holdings Limited	Amend Policy 4.38AA (c) as follows: (c) not granting any resource consent to exceed the Baseline GMP Loss Rate unless the application for resource consent demonstrates that water quality will be maintained managed within environmental limits; and		
PC5LWRP-1741A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		resolved: Amend Policy 4.38AA(c) as follows: (c) ~~not granting~~ any resource consent to exceed the Baseline GMP Loss Rate ~~unless the application for resource consent demonstrates~~will be assessed against the impact granting that consent will have on the ability to maintain ~~that~~water quality ~~will be maintained~~ ;		
PC5LWRP-1276D	Fertiliser Association of New Zealand	Retain Policy 4.38AA (d).	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1741B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 4.38AA(d) as follows: (d) requiring a Farm Environment Plan as part of any application for resource consent to use land for a farming activity, and requiring that Farm Environment Plan to be prepared in accordance with~~:~~ ~~(i) describe the specific on-farm actions that will be undertaken (and the timeframe within which these actions will be undertaken) to implement the Good Management Practices; and~~ ~~(ii) provide an explanation of how these on-farm actions will ensure progress towards the attainment of the management objectives and targets in~~ Schedule 7 of this plan. Or such other or alternative wording which would properly address the concerns raised.	Accept	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1494	Beef and Lamb New Zealand Ltd	Amend Policy 4.38AA(d)(ii) as follows: (d)(ii) provide an explanation of how ~~these~~ on-farm actions will ensure progress towards the attainment of the objectives and targets for the property in support of GMP. ~~in Schedule 7 of this plan.~~	Reject	In response to other submissions we are recommending that this clause be omitted.
PC5LWRP-1277	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.38AA, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Policy 4.38AB

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1217	Canterbury District Health Board	Retain Policy 4.38AB as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1802	Forest and Bird NZ	Retain Policy 4.38AB as notified.		
PC5LWRP-694	North Canterbury Fish and Game & SI Fish and Game	Retain Policy 4.38AB as notified.		
PC5LWRP-2845	McLean G and M	Delete Policy 4.38AB.	Reject	
PC5LWRP-2875	Forrester J and R	Delete Policy 4.38AB.		
PC5LWRP-2812	Sloss K	Delete Policy 4.38AB.		
PC5LWRP-2895	Forrester K	Delete Policy 4.38AB.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2913	Rangatahi Downs Land Trust	Delete Policy 4.38AB.		
PC5LWRP-656	Barrhill Chertsey Irrigation Scheme	Delete Policy 4.38AB.		
PC5LWRP-617	Central Plains Water Ltd	Delete Policy 4.38AB.		
PC5LWRP-184	Dairy Holdings Limited	Delete Policy 4.38AB.		
PC5LWRP-256	DairyNZ	Delete Policy 4.38AB.		
PC5LWRP-2256	Federated Farmers of New Zealand	Delete Policy 4.38AB.		
PC5LWRP-1290	Fertiliser Association of New Zealand	Delete Policy 4.38AB.		
PC5LWRP-109	Hunter Downs Development Company Limited	Delete Policy 4.38AB.		
PC5LWRP-2104	Irrigation New Zealand Inc	Delete Policy 4.38AB.		
PC5LWRP-926	Sparrow M	Delete Policy 4.38AB.		
PC5LWRP-274	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38AB.		
PC5LWRP-1594	Horticulture New Zealand	Delete Policy 4.38AB.		
PC5LWRP-730	Fonterra Co-operative Group Ltd	Delete Policy 4.38AB and make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-2837	Hoban J K W	Delete Policy 4.38AB		
PC5LWRP-1743	Ravensdown Limited	Delete Policy 4.38AB.		
PC5LWRP-2794	Maungatahi Farm Limited	Delete Policy 4.38AB.		
PC5LWRP-2931	Murchison JG and LM	Delete Policy 4.38AB.		
PC5LWRP-1471	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38AB, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-528	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38AB to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-2794A	Maungatahi Farm Limited	Amend Policy 4.38AB to enable consideration of permitted baseline test.	Accept	In response to this submission we recommend amending the policy appropriately.

Policy 4.38A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-878	Opuha Water Limited	Retain Policy 4.38A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2846	McLean G and M	Delete Policy 4.38A.	Reject	The omission of this policy would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-275	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38A.		
PC5LWRP-2876	Forrester J and R	Delete Policy 4.38A.		
PC5LWRP-2813	Sloss K	Delete Policy 4.38A.		
PC5LWRP-2896	Forrester K	Delete Policy 4.38A.		
PC5LWRP-2914	Rangatahi Downs Land Trust	Delete Policy 4.38A.		
PC5LWRP-1804	Forest and Bird NZ	Delete Policy 4.38A.		
PC5LWRP-2838	Hoban J K W	Delete Policy 4.38A.		
PC5LWRP-2949	Munro A R and K H	Delete Policy 4.38A.		
PC5LWRP-2932	Murchison JG and LM	Delete Policy 4.38A.		
PC5LWRP-2795	Maungatahi Farm Limited	Delete Policy 4.38A.		
PC5LWRP-1291	Fertiliser Association of New Zealand	Delete Policy 4.38A.		
PC5LWRP-529	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-105	Hunter Downs Development Company Limited	Amend to delete the restrictions on intensification in orange and blue and green zones, and allow for intensification up to good management practice loss rates.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2116	Irrigation New Zealand Inc	Amend Policy 4.38A as follows: Within the Red, Lake ~~Green, Light Blue~~ and Orange zones…	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2262	Federated Farmers of	Amend Policy 4.38A follows:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand	Within the Lake, Red, Orange, Green or Light Blue Nutrient Allocation Zones…		
PC5LWRP-1291A	Fertiliser Association of New Zealand	Amend Policy 4.38A to provide for resource consents based on clear decision guidelines appropriate for the different zones. Amend Policy 4.38A as follows: Within the Red, Orange, Green or Light Blue Nutrient Allocation Zones, ~~only consider the granting of~~require additional scrutiny, based on clear decision guidelines for an application for resource consent to exceed the nitrogen baseline ~~where~~unless:...	Accept in part	In response to this submission we recommend an amendment to require resource consent applications to include evidence that directly and specifically establishes that the exceedance was lawful.
PC5LWRP-660	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38A to read: Within the Red, Orange ~~, Green or Light Blue~~ Nutrient Allocation Zones, only consider the granting of an application for resource consent to exceed the nitrogen baseline where:	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-185	Dairy Holdings Limited	Amend Policy 4.38A to read: Within the Red, Orange ~~, Green or Light Blue~~ Nutrient Allocation Zones, only consider the granting of an application for resource consent to exceed the nitrogen baseline where:		
PC5LWRP-728	Fonterra Co-operative Group Ltd	Amend Policy 4.38A as follows: Within the Red, Orange, ~~Green or Light Blue~~ Nutrient Allocation Zones, only consider the granting of an application for resource consent to exceed the nitrogen baseline where:		
PC5LWRP-2262A	Federated Farmers of New Zealand	Amend Policy 4.38A(a) as follows: (a) the nitrogen baseline has been lawfully exceeded prior to 13 February 2016 ~~and the application contains evidence that the exceedance was lawful~~ ; and		
PC5LWRP-660A	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38A by inserting a new (a) as follows: (a) the applicant holds a resource consent authorising an exceedance of the nitrogen baseline that was granted prior to 13 February 2016 (including any renewal or replacement of that resource consent after 13 February 2016); or and by renumbering present (a) and (b) as (b)(i) and (b)(ii)	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-185A	Dairy Holdings Limited	Amend Policy 4.38A by inserting a new (a) as follows: (a) the applicant holds a resource consent authorising an exceedance of the nitrogen baseline that was granted prior to 13 February 2016 (including any renewal or replacement of that resource consent after 13 February 2016); or and by renumbering present (a) and (b) as (b)(i) and (b)(ii)		
PC5LWRP-257	DairyNZ	Amend Policy 4.38A (b) as follows: (b) the nitrogen loss calculation that occurred remains below ~~the lesser of~~ either the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice ~~or~~ and the nitrogen loss calculation that occurred in the four years prior to 13 February 2016. OR words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-638 PC5LWRP-997	Rangitata Diversion Race Management Limited Amuri Irrigation Co Limited	Amend Policy 4.38A(b) as follows, either; (b) the nitrogen loss calculation remains at, or below the ~~lesser of the Good Management Practice Loss Rate or the~~ nitrogen loss calculation that occurred in the four years prior to the 13th of February 2016 but that management practices are improved such that nitrogen losses below the root zone achieve the Good Management Practice Loss Rate over time AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-638A	Rangitata Diversion Race Management	Amend Policy 4.38A(b) as follows, either; (b) the nitrogen loss calculation remains at, or below the ~~lesser of the Good Management~~		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-997A	Limited Amuri Irrigation Co Limited	~~Practice Loss Rate or the~~ nitrogen loss calculation that occurred in the four years prior to the 13th of February 2016 but that management practices are improved such that nitrogen losses below the root zone achieve the Good Management Practice Loss Rate in accordance with the timeframes set out in Policy 4.38D. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-638B PC5LWRP-997B	Rangitata Diversion Race Management Limited Amuri Irrigation Co Limited	Amend Policy 4.38A(b) as follows; (b) the nitrogen loss calculation remains at, or below the ~~lesser of the Good Management Practice Loss Rate or the~~ nitrogen loss calculation that occurred in the four years prior to the 13th of February 2016 but that management practices are improved such that nitrogen losses below the root zone achieve the Good Management Practice Loss Rate in accordance with the timeframes set out in policies 4.37, 4.38 and 4.38AA. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-728B	Fonterra Co-operative Group Ltd	Amend Policy 4.38A as follows: (b) the nitrogen loss calculation that occurred remains below the lesser of the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice ~~or~~and the nitrogen loss calculation that occurred in the four years prior to 13 February 2016. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1595	Horticulture New Zealand	Amend Policy 4.38A to include a new clause: (c) the farm system cannot be adequately represented through OVERSEER® and the Farm Portal and the MGP proxy for the farm type overlaid with soil and climate data for the farm is applied to ascertain a leaching number for the property and Good Management Practices are used in the farming activity.		
PC5LWRP-1746	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved retain the overall intent of Policy 4.38A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-148	Barton N	Amend Policy 4.38A to incorporate the amended definition of the 'Baseline GMP Loss Rate' OR Amend relevant policies to include an alternative pathway as follows: A water permit was granted prior to 13 February 2016 and the nitrogen loss was permitted by the LWRP when the water permit was granted (including any renewal or replacement of that resource consent after 13 February 2016). OR words to similar effect.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1472	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38A, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.		

Policy 4.38B

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-258	DairyNZ	Retain Policy 4.38B as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2847	McLean G and M	Delete Policy 4.38B.	Reject	The omission of this policy would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2877	Forrester J and R	Delete Policy 4.38B.		
PC5LWRP-2814	Sloss K	Delete Policy 4.38B.		
PC5LWRP-2897	Forrester K	Delete Policy 4.38B.		
PC5LWRP-2915	Rangatahi Downs Land Trust	Delete Policy 4.38B.		
PC5LWRP-1293	Fertiliser Association of New Zealand	Delete Policy 4.38B.		
PC5LWRP-276	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38B.		
PC5LWRP-2841	Hoban J K W	Delete Policy 4.38B.		
PC5LWRP-1745	Ravensdown Limited	Delete Policy 4.38B. Or such other alternative wording which would properly address the concerns raised.		
PC5LWRP-2933	Murchison JG and LM	Delete Policy 4.38B.		
PC5LWRP-2950	Munro A R and K H	Delete Policy 4.38B.		
PC5LWRP-2796	Maungatahi Farm Limited	Delete Policy 4.38B.		
PC5LWRP-530	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38B to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-661	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38B to refer to 'people undertaking a farming activity' rather than 'property owners'.		
PC5LWRP-2264	Federated Farmers of New Zealand	Amend Policy 4.38B to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results.	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1805	Forest and Bird NZ	Amend Policy 4.38B to include provisions such as methods outlining the periodic review and monitoring requirements necessary to support the success of the Farm Portal to be undertaken by ECAN. AND add provisions which identify a course of action should the portal prove ineffective within 5 years.	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1638	Horticulture New	Amend Policy 4.38B to include thresholds based on a 20% increase in area irrigated and a 20%	Reject	We are not persuaded that the amendment requested would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Zealand	increase in stock numbers over which Policy 4.38B is applied.		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2105	Irrigation New Zealand Inc	Amend Policy 4.38B as follows: …are monitored through requiring property owners, excluding those that belong to a consented irrigation scheme or farming enterprise , to submit information relating to~~regarding their type and intensity of~~ nutrient losses from their farming activity to the Farm Portal;…	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-644	Rangitata Diversion Race Management Limited	Amend Policy 4.38B as follows: Effects on water quality … , are monitored ~~through~~ by either: (a) requiring property owners to submit … as part of its monitoring programme; or (b) where irrigation schemes or principal water suppliers are managing nutrient loads on behalf of a group of farming activities, to require the principal water suppliers or irrigation schemes to periodically submit details of their nutrient load to the Environment Canterbury, setting out how the load was calculated and how it conforms with any nutrient load prescribed in their resource consent or in a permitted activity rule; And make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1278	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.38B, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1473	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38B, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-149	Barton N	Amend Policy 4.38B to incorporate the amended definition of the 'Baseline GMP Loss Rate', OR Amend relevant policies to include an alternative pathway as follows: A water permit was granted prior to 13 February 2016 and the nitrogen loss was permitted by the LWRP when the water permit was granted (including any renewal or replacement of that resource consent after 13 February 2016). Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-695	North Canterbury Fish and Game and SI Fish and Game	Amend Policy 4.38B as follows: Effects on water quality… is periodically reviewed by Environment Canterbury as part of its monitoring programme, including random checks for contributions to the portal and minimum Management Plan requirements and achieved actions, for permitted activity land users.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Policy 4.38C

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-259	DairyNZ	Retain Policy 4.38C as notified.	Accept	We agree that retaining the policy is appropriate.
PC5LWRP-2265	Federated Farmers of New Zealand	Retain Policy 4.38C as notified.		
PC5LWRP-2117	Irrigation New Zealand Inc	Retain Policy 4.38C subject to conditions.		
PC5LWRP-1749	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved retain the overall intent and timeframes of Policy 4.38C as notified.		
PC5LWRP-2848	McLean G and M	Delete Policy 4.38C.	Reject	We are not persuaded that the omission of this policy would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2878	Forrester J and R	Delete Policy 4.38C.		
PC5LWRP-2815	Sloss K	Delete Policy 4.38C.		
PC5LWRP-2898	Forrester K	Delete Policy 4.38C.		
PC5LWRP-2916	Rangatahi Downs Land Trust	Delete Policy 4.38C.		
PC5LWRP-277	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38C.		
PC5LWRP-2850	Hoban J K W	Delete Policy 4.38C.		
PC5LWRP-2951	Munro A R and K H	Delete Policy 4.38C.		
PC5LWRP-2934	Murchison JG and LM	Delete Policy 4.38C.		
PC5LWRP-2797	Maungatahi Farm Limited	Delete Policy 4.38C.		
PC5LWRP-993	Amuri Irrigation Co Limited	Delete Policy 4.38C.		
PC5LWRP-623	Rangitata Diversion Race Management Limited	Delete Policy 4.38C.		
PC5LWRP-1474	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38C, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1294	Fertiliser Association of New Zealand	Amend Policy 4.38C to be at least 2020 and could be extended to 2025 or beyond.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-993A	Amuri Irrigation Co Limited	Amend the policy 4.38C to include a robustly derived and appropriate transition period to achieve the Baseline GMP Loss Rate and the GMP Loss Rate, AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-623A	Rangitata Diversion Race Management Limited	Amend the policy 4.38C to include a robustly derived and appropriate transition period to achieve the Baseline GMP Loss Rate and the GMP Loss Rate, AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-532	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38C to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1806	Forest and Bird NZ	Amend Policy 4.38C to ensure that the baseline GMP Loss Rate has effect immediately.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1041	Dave Ashby Rural Consultants Limited	Amend Policy 4.38C to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-670	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38C as follows: Where a policy or a condition in a rule requires compliance with a Baseline GMP Loss rate, compliance with that loss rate shall , except as provided by Policy 4.33CC, not be required prior to 30 June 2020.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-186A	Dairy Holdings Limited	Amend Policy 4.38C as follows: Where a policy or a condition in a rule requires compliance with a Baseline GMP Loss rate, compliance with that loss rate shall , except as provided by Policy 4.33CC, not be required prior to 30 June 2020.		
PC5LWRP-1499	Beef and Lamb New Zealand Ltd	Amend Policy 4.38C as follows: Where a policy or condition in a rule requires the application of Good Management Practices and compliance with a Baseline GMP Loss Rate, compliance with that loss rate shall not be required prior to 30 June 2020.		
PC5LWRP-2250	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.38C as follows: Where a policy or condition in a rule requires the application of Good Management Practices and compliance with a Baseline GMP Loss Rate, compliance with that loss rate shall not be required prior to 30 June 2020.		
PC5LWRP-186	Dairy Holdings Limited	Amend Policy 4.38C to ensure that the Baseline GMP Loss Rate only need to be complied with by 30 June 2030.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-107	Hunter Downs Development Company	Amend to delete the restrictions on intensification in orange and blue and green zones, and allow for intensification up to good management practice loss rates.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited			

Policy 4.38D

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2849	McLean G and M	Delete Policy 4.38D.	Reject	The omission of this policy would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2816	Sloss K	Delete Policy 4.38D.		
PC5LWRP-2879	Forrester J and R	Delete Policy 4.38D.		
PC5LWRP-2899	Forrester K	Delete Policy 4.38D.		
PC5LWRP-2917	Rangatahi Downs Land Trust	Delete Policy 4.38D.		
PC5LWRP-278	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38D.		
PC5LWRP-2798	Maungatahi Farm Limited	Delete Policy 4.38D.		
PC5LWRP-2857	Hoban J K W	Delete Policy 4.38D.		
PC5LWRP-2935	Murchison JG and LM	Delete Policy 4.38D.		
PC5LWRP-2952	Munro A R and K H	Delete Policy 4.38D.		
PC5LWRP-995	Amuri Irrigation Co Limited	Delete Policy 4.38D. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-628	Rangitata Diversion Race Management Limited	Delete Policy 4.38D. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-1807	Forest and Bird NZ	Amend Policy 4.38D to ensure that the Good Management Practice Loss Rate requirement has effect immediately.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-533	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.38D to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-108	Hunter Downs Development Company Limited	Amend to delete the restrictions on intensification in orange and blue and green zones, and allow for intensification up to good management practice loss rates.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1500	Beef and Lamb New Zealand Ltd	Amend Policy 4.38D as follows: Where a policy or rule requires a farming activity to be managed in accordance with the Good Management Practices and the Good Management Practices Loss Rate, compliance with that	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		loss rate shall not be required prior to: …		the superior instruments.
PC5LWRP-2257	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.38D as follows: Where a policy or rule requires a farming activity to be managed in accordance with the Good Management Practices and the Good Management Practices Loss Rate, compliance with that loss rate shall not be required prior to: …		
PC5LWRP-628A	Rangitata Diversion Race Management Limited	Amend the policy 4.38D to include a robustly derived and appropriate transition period to achieve the Baseline GMP Loss Rate and the GMP Loss Rate. AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-995A	Amuri Irrigation Co Limited	Amend the policy 4.38D to include a robustly derived and appropriate transition period to achieve the Baseline GMP Loss Rate and the GMP Loss Rate. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-187	Dairy Holdings Limited	Amend Policy 4.38D to ensure that the Baseline GMP Loss Rate only need to be complied with by 30 June 2030.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1644	Horticulture New Zealand	Amend Policy 4.38D so that the dates of compliance are the same as Policy 4.38C – 30 June 2020.		
PC5LWRP-2118 PC5LWRP-187A PC5LWRP-260A PC5LWRP-671A	Irrigation New Zealand Inc Dairy Holdings Limited DairyNZ Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38D(a) as follows: (a) 1 July 2017 ~~1 July 2016~~ for any land where...	Reject	In response to other submissions we have recommended an amendment to the date requested.
PC5LWRP-2266	Federated Farmers of New Zealand	Amend Policy 4.38D(a) as follows: (a) ~~1 July 2016~~1 January 2017 for any land where part of the property is located within the Lake Zone.	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1336A	Fertiliser Association of New Zealand	Amend Policy 4.38D(a) as follows: (a) 1 July ~~2016~~ 2018 for any land where part of the property is located within the Lake Zone;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-187B PC5LWRP-260B PC5LWRP-671B	Dairy Holdings Limited DairyNZ Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38D(b) as follows: (b) 1 January 201~~7~~8 for any land where part of the property is located within the Orange Nutrient Allocation Zone;	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1336B	Fertiliser Association of New Zealand	Amend Policy 4.38D(b) as follows: (b) 1 January ~~2017~~ 2019 for any land where part of the property is located within the Orange Nutrient Allocation Zone;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-187C PC5LWRP-260C PC5LWRP-671C	Dairy Holdings Limited DairyNZ Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38D(c) as follows: (c) 1 July 201~~7~~8 for any land where part of the property is located within the Red Nutrient Allocation Zone;	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1336	Fertiliser Association of New Zealand	Amend Policy 4.38D(c) as follows: (c) 1 July ~~2017~~2019 for any land where part of the property is located within the Red Nutrient Allocation Zone;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-187D PC5LWRP-260D PC5LWRP-671D	Dairy Holdings Limited DairyNZ Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38D(d) as follows: (d) 1 January 2018~~9~~ for any land where part of the property is located within the Green or Light Blue Nutrient Allocation Zone,	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1336C	Fertiliser Association of New Zealand	Amend Policy 4.38D(d) as follows: (d) 1 January ~~2018~~ 2020 for any land where part of the property is located within the Green or Light Blue Nutrient Allocation Zone.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-671E	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.38D by adding the following clauses after (d): except where it can be demonstrated by the applicant that: (e) the Farm Portal does not provide accurate or appropriate Good Management Practice Loss Rate for the farming activity undertaken; and (f) good management practices and the matters set out in Schedule 28 are being achieved.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-187E	Dairy Holdings Limited	Amend Policy 4.38D by adding the following clauses after (d) except where it can be demonstrated by the applicant that: (e) the Farm Portal does not provide accurate or appropriate Good Management Practice Loss Rate for the farming activity undertaken; and (f) good management practices and the matters set out in Schedule 28 are being achieved.		
PC5LWRP-1753	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the overall intent of Policy 4.38D as notified, subject to changes in the timeframes as follows: • In Clause (a) 1 July ~~2016~~ becomes 1 July 2018; • In Clause (b) 1 January ~~2017~~ becomes 1 January 2019; • In Clause (c) 1 July ~~2017~~ becomes 1 July 2019; • In Clause (d) 1 January 2018 becomes 1 January 2020. Or such other or alternative wording which would properly address the concerns raised	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-154	Barton N	Amend Policy 4.38D to incorporate the amended definition of the 'Baseline GMP Loss Rate', OR Amend relevant policies to include an alternative pathway as follows:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		A water permit was granted prior to 13 February 2016 and the nitrogen loss was permitted by the LWRP when the water permit was granted (including any renewal or replacement of that resource consent after 13 February 2016). Or words to similar effect.		objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1475	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38D, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Policy 4.38E

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-261	DairyNZ	Retain Policy 4.38E as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1347	Fertiliser Association of New Zealand	Retain Policy 4.38E as notified.		
PC5LWRP-2121	Irrigation New Zealand Inc	Retain Policy 4.38E as notified.		
PC5LWRP-894	Opuha Water Limited	Retain Policy 4.38E as notified.		
PC5LWRP-1755	Ravensdown Limited	Retain the intent of Policy 4.38E as notified.		
PC5LWRP-2851	McLean G and M	Delete Policy 4.38E.	Reject	The omission of this policy would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2880	Forrester J and R	Delete Policy 4.38E.		
PC5LWRP-2817	Sloss K	Delete Policy 4.38E.		
PC5LWRP-2900	Forrester K	Delete Policy 4.38E.		
PC5LWRP-2918	Rangatahi Downs Land Trust	Delete Policy 4.38E.		
PC5LWRP-279	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.38E.		
PC5LWRP-2799	Maungatahi Farm Limited	Delete Policy 4.38E.		
PC5LWRP-2860	Hoban J K W	Delete Policy 4.38E.		
PC5LWRP-2936	Murchison JG and LM	Delete Policy 4.38E.		
PC5LWRP-2953	Munro A R and K H	Delete Policy 4.38E.		
PC5LWRP-534	Egg Producers Federation and Poultry	Amend Policy 4.38E to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Industry Association			achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2267	Federated Farmers of New Zealand	Amend Policy 4.38E to refer only to P loss where there is potential for erosion (e.g. on erosion prone soils on hill country), where there is potential for loss of P along with sediment loss.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1808	Forest and Bird NZ	Amend Policy 4.38E to direct 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.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-696	North Canterbury Fish and Game & SI Fish and Game	Amend Policy 4.38E(b) as follows: (b) requiring any ~~application for resource consent for a~~ farming activity that is located within a Phosphorus Risk Zone to identify within the Farm Environment Plan or Management Plan the critical areas for phosphorus loss; and AND further or alternative relief to the effect of that sought.	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1279	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.38E, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1476	Hurunui SNA Group & Rural Advocacy	Delete Policy 4.38E, and replace it with a policy that works with landowners in a catchment board model to • develop and support voluntary on-farm actions and plans, where appropriate, and encourage GMPs; • acknowledge and support voluntary efforts of landowners to adopt GMPs; • implement a comprehensive water quality monitoring and robust scientific investigations programme; • have no regulation on farming activities in Blue or Green Nutrient Allocation zones, except for irrigation and dairy effluent management.		

Policy 4.39

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2852	McLean G and M	Delete Policy 4.39.	Reject	The submission is outside the scope of the Plan Change. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-2881	Forrester J and R	Delete Policy 4.39.		
PC5LWRP-2818	Sloss K	Delete Policy 4.39.		
PC5LWRP-2901	Forrester K	Delete Policy 4.39.		
PC5LWRP-2919	Rangatahi Downs Land Trust	Delete Policy 4.39.		
PC5LWRP-2861	Hoban J K W	Delete Policy 4.39.		
PC5LWRP-2937	Murchison JG and LM	Delete Policy 4.39.		
PC5LWRP-2954	Munro A R and K H	Delete Policy 4.39.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2800	Maungatahi Farm Limited	Delete Policy 4.39.		
PC5LWRP-1219	Canterbury District Health Board	Amend Policy 4.39 to exclude the word '~~minimise~~' and replace with " ...effectively mitigate impacts on the receiving water body."		
PC5LWRP-535	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.39 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-2268	Federated Farmers of New Zealand	Amend Policy 4.39 (c) as follows: (c) wastewater discharge from a hospital, a school or other education or community institution		

Policy 4.40

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1349	Fertiliser Association of New Zealand	Retain Policy 4.40 as notified.	Accept	We agree that the policy should be retained.
PC5LWRP-2273	Federated Farmers of New Zealand	Retain Policy 4.40 as notified.		
PC5LWRP-1756	Ravensdown Limited	Retain the intent of Policy 4.40 as notified.		
PC5LWRP-625	Central Plains Water Ltd	Retain Policy 4.40 as notified subject to clarification that there is no requirement to prepare 'duplicate' farm environment plans for irrigation schemes.		
PC5LWRP-112	Hunter Downs Development Company Limited	Retain Policy 4.40 as notified subject to clarification that there is no requirement to prepare 'duplicate' farm environment plans for irrigation schemes.		
PC5LWRP-2853	McLean G and M	Delete Policy 4.40.	Reject	The submission is outside the scope of the Plan Change. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-2882	Forrester J and R	Delete Policy 4.40.		
PC5LWRP-2819	Sloss K	Delete Policy 4.40.		
PC5LWRP-2902	Forrester K	Delete Policy 4.40.		
PC5LWRP-2920	Rangatahi Downs Land Trust	Delete Policy 4.40.		
PC5LWRP-2801	Maungatahi Farm Limited	Delete Policy 4.40.		
PC5LWRP-2862	Hoban J K W	Delete Policy 4.40.		
PC5LWRP-2938	Murchison JG and LM	Delete Policy 4.40.		
PC5LWRP-2955	Munro A R and K H	Delete Policy 4.40.		
PC5LWRP-536	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.40 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-1809	Forest and Bird NZ	Amend Policy 4.40 or other provisions within the plan to provide for direction achieving best		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		practice.		
PC5LWRP-1009	Dave Ashby Rural Consultants Limited	Amend Policy 4.40 as follows: Farm Environment Plans are used as ~~a~~the primary means of identifying and delivering good environmental practice across a range of farm activities, including but not limited to nutrient loss management, efficient and effective use of water for irrigation, riparian management, stock movements across waterways, offal and farm rubbish pits, the storage and application of effluent and fertiliser use; and OVERSEER® is used as a tool to provide information about the merits of respective strategies for the use of nutrients and thus encourage overall efficient resource use		

Policy 4.41

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2289	Federated Farmers of New Zealand	Retain Policy 4.41 as notified.	Accept	We agree that retaining the policy is appropriate.
PC5LWRP-1355	Fertiliser Association of New Zealand	Retain Policy 4.41.		
PC5LWRP-1810	Forest and Bird NZ	Retain Policy 4.41 as notified.		
PC5LWRP-1013	Ravensdown Limited	Retain the intent of Policy 4.41 as notified		
PC5LWRP-626	Central Plains Water Ltd	Retain Policy 4.41 as notified subject to clarification that there is no requirement to prepare 'duplicate' farm environment plans for irrigation schemes.	Accept in part	We agree that retaining the policy is appropriate. We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-113	Hunter Downs Development Company Limited	Retain Policy 4.41 as notified subject to clarification that there is no requirement to prepare 'duplicate' farm environment plans for irrigation schemes.		
PC5LWRP-2883	Forrester J and R	Delete Policy 4.41.	Reject	The omission of this policy would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2820	Sloss K	Delete Policy 4.41.		
PC5LWRP-2903	Forrester K	Delete Policy 4.41.		
PC5LWRP-2921	Rangatahi Downs Land Trust	Delete Policy 4.41.		
PC5LWRP-2802	Maungatahi Farm Limited	Delete Policy 4.41.		
PC5LWRP-2863	Hoban J K W	Delete Policy 4.41.		
PC5LWRP-2956	Munro A R and K H	Delete Policy 4.41.		
PC5LWRP-2939	Murchison JG and LM	Delete Policy 4.41.		
PC5LWRP-537	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.41 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1013A	Ravensdown Limited	Amend Policy 4.41(b) to delete the word ' ~~meaningfully~~'; Or such other or alternative wording which would properly address the concerns raised.	Reject	Clause b of Policy 4.41 is outside the scope of the Plan Change. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-1355A	Fertiliser Association of New Zealand	Amend Policy 4.41 to include a new clause: f) information and planning details required should be commensurate with the level of risk of nutrient loss and risk of environmental impact, particularly for low risk land use activities.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1810A	Forest and Bird NZ	Amend Policy 4.41 to include direction for audit requirements.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-1280	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.41, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Policy 4.41A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2855	McLean G and M	Delete Policy 4.41A.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2884	Forrester J and R	Delete Policy 4.41A.		
PC5LWRP-2821	Sloss K	Delete Policy 4.41A.		
PC5LWRP-2904	Forrester K	Delete Policy 4.41A.		
PC5LWRP-2922	Rangatahi Downs Land Trust	Delete Policy 4.41A.		
PC5LWRP-280	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.41A.		
PC5LWRP-2803	Maungatahi Farm Limited	Delete Policy 4.41A.		
PC5LWRP-2864	Hoban J K W	Delete Policy 4.41A.		
PC5LWRP-2957	Munro A R and K H	Delete Policy 4.41A.		
PC5LWRP-2940	Murchison JG and LM	Delete Policy 4.41A.		
PC5LWRP-538	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.41A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-701	Ravensdown Limited	Amend Policy 4.41A as follows: The contribution that the preparation of ~~accurate~~ nutrient budgets and Farm Environment Plans make to the attainment of the water quality outcomes is recognised by: Or such other or alternative wording which would properly address the concerns raised.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1356	Fertiliser Association of New Zealand	Amend Policy 4.41A(a) as follows: (a) requiring the preparation of nutrient budgets in accordance with the OVERSEER® Best Practice Input Standards by a Certified Nutrient Management Adviser ; and…	Reject	The requested amendment would be disproportionately onerous.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-701A	Ravensdown Limited	Amend Policy 4.41A(a) as follows: (a) requiring the preparation of nutrient budgets in accordance with the OVERSEER® Best Practice Input Standards by a Certified Nutrient Management Adviser ; and		
PC5LWRP-675C	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41A by inserting a new clause (ba) as follows: (ba) providing a requirement in resource consents held by irrigation schemes and principal water suppliers for the preparation and oversight of Farm Environment Plans	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-629A	Central Plains Water Ltd	Amend Policy 4.41A by inserting a new clause (ba) as follows: (ba) providing a requirement in resource consents held by irrigation schemes and principal water suppliers for the preparation and oversight of Farm Environment Plans		
PC5LWRP-115A	Hunter Downs Development Company Limited	Amend Policy 4.41A by inserting a new clause (ba) as follows: (ba) providing a requirement in resource consents held by irrigation schemes and principal water suppliers for the preparation and oversight of Farm Environment Plans		
PC5LWRP-701B	Ravensdown Limited	Delete Policy 4.41A(b).	Reject	We are not persuaded that the omission of this clause would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2291	Federated Farmers	Delete Policy 4.41A(b).		
PC5LWRP-1222	Canterbury District Health Board	Amend Policy 4.41A(b) to reflect that a person of higher qualification [who prepares a nutrient budget] will get less scrutiny.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-927	Sparrow M	Amend Policy 4.41A (b) as follows: Applying to any nutrient budget that forms part of an application for resource consent a level of scrutiny that is proportional to ~~the qualifications, experience and performance of the person who prepared the budget;~~scale of the activity proposed and the level of risk associated with the proposed activity; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1811	Forest and Bird NZ	Delete Policy 4.41A(c).	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2123	Irrigation New Zealand Inc	Delete Policy 4.41A(c).		
PC5LWRP-701C	Ravensdown Limited	Amend Policy 4.41A(c) as follows: ~~(c)~~ (b) providing a controlled activity consent pathway for resource consent applications where the nutrient budget has been prepared or reviewed a Certified Nutrient Management Advisor and the Farm Environment Plan has~~that have~~ been prepared or reviewed by an Accredited Farm Consultant.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-262C	DairyNZ	Amend Policy 4.41A(c) as follows: (c) providing a controlled activity consent pathway for resource consent applications which considers, among other matters, whether that application has ~~ve~~ been prepared or reviewed by an Accredited Farm Consultant.		
PC5LWRP-930	Sparrow M	Amend Policy 4.41A(c) as follows: providing a controlled activity consent pathway for resource consent applications ~~that have been prepared or reviewed by an Accredited Farm Consultant.~~ where the scale of the activity proposed is limited and the level of risk associated with the proposed activity is low.		
PC5LWRP-629B	Central Plains Water Ltd	Amend Policy 4.41A(c) as follows: (c) providing a controlled activity consent pathway for resource consent applications in relation to properties that do not receive water from an irrigation scheme or principal water supplier that have been prepared or reviewed by an Accredited Farm Consultant.	Accept in part	In response to this and other submissions we are recommending amendments which clarify the circumstances under which the controlled activity path applies.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-675B	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41A(c) as follows: (c) providing a controlled activity consent pathway for resource consent applications in relation to properties that do not receive water from an irrigation scheme or principal water supplier that have been prepared or reviewed by an Accredited Farm Consultant.		
PC5LWRP-115B	Hunter Downs Development Company Limited	Amend Policy 4.41A(c) as follows: (c) providing a controlled activity consent pathway for resource consent applications in relation to properties that do not receive water from an irrigation scheme or principal water supplier that have been prepared or reviewed by an Accredited Farm Consultant.		
PC5LWRP-841	Opuha Water Limited	Amend Policy 4.41A(c) to include either: 1) the experience of the person who prepared the Farm Environment Plan as one of the matters over which Environment Canterbury reserves control; OR 2) add the words ...or suitably experienced person at the end ; Or words to similar effect.	Accept in part	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. Provisions in Plan Change 5 relating to the qualifications required to prepare a nutrient budget already address these matters.
PC5LWRP-1281	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.41A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Policy 4.41B

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-627	Central Plains Water Ltd	Retain Policy 4.41B as notified subject to clarification that there is no requirement to prepare 'duplicate' farm environment plans for irrigation schemes.	Accept in part	We agree that retaining the policy is appropriate. We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-114	Hunter Downs Development Company Limited	Retain Policy 4.41B as notified subject to clarification that there is no requirement to prepare 'duplicate' farm environment plans for irrigation schemes.		
PC5LWRP-2856	McLean G and M	Delete Policy 4.41B.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2885	Forrester J and R	Delete Policy 4.41B.		
PC5LWRP-2905	Forrester K	Delete Policy 4.41B.		
PC5LWRP-2923	Rangatahi Downs Land Trust	Delete Policy 4.41B.		
PC5LWRP-2822	Sloss K	Delete Policy 4.41B.		
PC5LWRP-281	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.41B.		
PC5LWRP-2804	Maungatahi Farm Limited	Delete Policy 4.41B.		
PC5LWRP-2865	Hoban J K W	Delete Policy 4.41B.		
PC5LWRP-2958	Munro A R and K H	Delete Policy 4.41B.		
PC5LWRP-2941	Murchison JG and LM	Delete Policy 4.41B.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-676	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41B to correct typographical numbering errors.	Accept	In response to this and other submissions we recommend an amendment to the effect requested.
PC5LWRP-190	Dairy Holdings Limited	Amend Policy 4.41B to correct typographical numbering errors.		
PC5LWRP-539	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.41B to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2260	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.41B as follows: Attainment of the water quality outcomes for the region are enhanced through the implementation of ~~g~~Good ~~m~~Management ~~p~~Practice and by:	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1508A	Beef and Lamb New Zealand Ltd	Amend Policy 4.41B as follows: Attainment of the water quality outcomes for the region are enhanced through the implementation of ~~g~~Good ~~m~~Management ~~p~~Practice and by:		
PC5LWRP-933	Sparrow M	Amend Policy 4.41B as follows: Attainment of the water quality outcomes for the region are enhanced through the auditing of the implementation of good management practice ~~and~~	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-2124	Irrigation New Zealand Inc	Amend Policy 4.41B(a) as follows: (a) … targets and actions in the Farm Environment Plan and Good Management Practices, ~~and Good Management Practices Loss Rate~~ and; …	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1508B	Beef and Lamb New Zealand Ltd	Amend Policy 4.41B(a) as follows: (a) the use of an audit grade as a measure of a farming activity's overall performance relative to ~~the~~ objectives ~~, targets and actions in the Farm Environment Plan, and~~ the Good Management Practices and the objectives, targets and actions in the Farm Environment Plan and the Good Management Practice Nitrogen Loss Rates;…		
PC5LWRP-2260A	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.41B(a) as follows: (a) the use of an audit grade as a measure of a farming activity's overall performance relative to ~~the~~ objectives ~~, targets and actions in the Farm Environment Plan, and~~ the Good Management Practices and the objectives, targets and actions in the Farm Environment Plan and the Good Management Practice Nitrogen Loss Rates;…		
PC5LWRP-1760A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved; Amend Policy 4.41B to insert a note or a schedule in the plan that provides information on the proposed audit grades.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1760B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved; Amend Policy 4.41B(a) to: • include an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; and • include an additional formal process for reviewing and moderating inaccurate portal results; and	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		• embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-933A	Sparrow M	Amend Policy 4.41B(b) as follows: (b) the use of audit grades as the basis for determining the level of compliance and the frequency of the need for any future audits; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-933B	Sparrow M	Amend Policy 4.41B(c) as follows: (c) requiring the completion of corrective actions to address incidence of non-compliance ~~s~~ identified in the Farm Environment Plan audit; and…		
PC5LWRP-784	Purata Farming Ltd	Delete Policy 4.41B(e) OR Clearly state the circumstances when actual data is to be used.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2124A	Irrigation New Zealand Inc	Amend Policy 4.41B(e) as follows: (e) requiring the nitrogen loss calculation to be ~~prepared using annual input data~~reviewed in circumstances where:		
PC5LWRP-2292	Federated Farmers of New Zealand	Amend Policy 4.41B(e), as follows: (e) requiring ~~the~~ nitrogen loss ~~calculation~~ to be calculated ~~prepared~~ using annual input data, as appropriate, in circumstances where ~~:~~objectives of the FEP not being met, based on previous audits, or where there is land use change.		
PC5LWRP-1388	Fertiliser Association of New Zealand	Amend Policy 4.41B(e) (e) requiring the nitrogen loss calculation to be prepared once every three years unless there is a significant farm system change ~~using annual input data in circumstances~~ where:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2260B	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Policy 4.41B(e) because it does not make sense and is presumably a type setting error and should be joined to (f).	Accept	We agree and recommend amendments accordingly.
PC5LWRP-1760	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved; Amend Policy 4.41B(e) to require the nitrogen loss calculation to be prepared once every three years unless there is a significant farm system change identified by the Certified Farm Management Plan Auditor; Or such other or alternative wording which would properly address the concerns raised.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2292A	Federated Farmers of New Zealand	Delete Policy 4.41B(f).		
PC5LWRP-1388A	Fertiliser Association of New Zealand	Amend Policy 4.41B(f) as follows: ~~(f) the results of the most recent audit indicate there is a low level of confidence that the objectives in the Farm Environment Plan are being met; or~~ a significant farm system change is represented by: (i) the area of irrigated land has increased, as compared with the area of land that was irrigated at the time of the most recent audit; or (ii) the area of land used for winter grazing has increased as compared with the area of land that was used for winter grazing at the time of the most recent audit.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-870	Opuha Water Limited	Amend Policy 4.41B(f)(ii) to recognise the environmental effects of winter grazing are not solely related to the size of area used, Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1813	Forest and Bird NZ	Amend Policy 4.41B(f)(iii) as follows: (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.		
PC5LWRP-1388B	Fertiliser Association of New Zealand	Amend Policy 4.41B to include a new clause as follows: provide a reduction in audit frequency where the results of ~~the most~~ recent audit s indicate ~~there is a low level of confidence~~ that the ~~objectives in~~targets of the Farm Environment Plan are being consistently met; ~~or~~		
PC5LWRP-1813A	Forest and Bird NZ	Amend Policy 4.41B by inserting a new clause as follows: 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.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. It is not appropriate that the LWRP or any change to it direct the executive functions of the Council.
PC5LWRP-818	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Policy 4.41B to include a new clause as follows: 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.	Accept in part	In response to this and other submissions we recommend an amendment to Schedule 7 to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1813B	Forest and Bird NZ	Amend Policy 4.41B by inserting a new clause as follows: undertaking regular checks of the farm portal information.	Accept in part	In response to this and other submissions we recommend an amendment to Policy 4.38B(b) to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1813C	Forest and Bird NZ	Amend Policy 4.41B by inserting a new clause as follows: analysis of consent and general environmental monitoring results.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1650	Horticulture New Zealand	Amend Policy 4.41B to include a new clause: the audit and audit grades will be undertaken in accordance with the Environment Canterbury Certified Farm Environment Plan Auditor Manual February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. It is not appropriate that the LWRP or any change to it direct the executive functions of the Council.
PC5LWRP-1282	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.41B, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-263	DairyNZ	Amend Policy 4.41B to include: 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; OR	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		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; OR the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1650A	Horticulture New Zealand	Amend Policy 4.41B to include a new clause requiring notification of the Certified Farm Environment Plan Auditor Manual February 2016 for public consultation;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. It is not appropriate that the LWRP or any change to it direct the executive functions of the Council.

Policy 4.41C

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1763	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved; Retain the intent of Policy 4.41C as notified subject to [non-specified] minor amendment.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2126	Irrigation New Zealand Inc	Amend Policy 4.41C as follows: Maintain water quality in Red , Orange ~~Green and Light Blue~~ and Lake zones ~~and improve water quality in Red Nutrient Allocation zones and Lake Zones~~ by requiring:	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-117	Hunter Downs Development Company Limited	Amend Policy 4.41C as follows: ~~Maintain~~ Manage water quality in Orange, Green and Light Blue Nutrient Allocation Zones, and improve water quality in Red Nutrient Allocation Zones and Lake Zones by requiring:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-677A	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41C as follows: ~~Maintain~~ Manage water quality in Orange, Green and Light Blue Nutrient Allocation Zones, and improve water quality in Red Nutrient Allocation Zones and Lake Zones by requiring:		
PC5LWRP-192	Dairy Holdings Limited	Amend Policy 4.41C as follows: ~~Maintain~~ Manage water quality in Orange, Green and Light Blue Nutrient Allocation Zones, and improve water quality in Red Nutrient Allocation Zones and Lake Zones by requiring:		
PC5LWRP-1814	Forest and Bird NZ	Amend Policy 4.41C to remove the provision for 5kg exceedance and insert the following clauses: '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' AND 'excluding cattle, deer and pigs form permanent waterbodies and intermittent waterbodies with an active bed greater than 1m.;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1047	Dave Ashby Rural Consultants Limited	Amend Policy 4.41C to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1814A	Forest and Bird NZ	Amend Policy 4.41C by inserting a new clause as follows: 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.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1814B	Forest and Bird NZ	Amend Policy 4.41C by inserting a new clause as follows: excluding cattle, deer and pigs from permanent waterbodies and intermittent waterbodies with an active bed greater than 1m.	Reject	Provisions in the LWRP already address these matters.
PC5LWRP-1008	Amuri Irrigation Co Limited	Insert a new clause (c) to Policy 4.41C as follows: an application is to specify if the irrigation scheme or principal water supplier is to manage the nutrient load associated with the discharge permit on a 'property by property basis' or aggregated across the command area of the scheme or supplier. AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Accept	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2823	Sloss K	Delete Policy 4.41C.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2906	Forrester K	Delete Policy 4.41C.		
PC5LWRP-2924	Rangatahi Downs Land Trust	Delete Policy 4.41C.		
PC5LWRP-282	Ellesmere Sustainable Agriculture Inc	Delete Policy 4.41C.		
PC5LWRP-2866	Hoban J K W	Delete Policy 4.41C.		
PC5LWRP-2805	Maungatahi Farm Limited	Delete Policy 4.41C.		
PC5LWRP-2942	Murchison JG and LM	Delete Policy 4.41C.		
PC5LWRP-2959	Munro A R and K H	Delete Policy 4.41C.		
PC5LWRP-1007	Amuri Irrigation Co Limited	Retain Policy 4.41C(a) as notified.	Accept in part	Except to the extent that we are recommending omissions or amendments to the notified provisions in accordance with Clause 16(2) of Schedule 1 to the RMA, we recommend that they are retained as notified.
PC5LWRP-264	DairyNZ	Retain Policy 4.41C (a) as notified.		
PC5LWRP-1509	Beef and Lamb New Zealand Ltd	Amend Policy 4.41C (a) as follows: (a) any application….implement the ~~g~~Good ~~m~~Management ~~p~~Practices…	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2270	Ellesmere Sustainable Agriculture Inc	Amend Policy 4.41C (a) as follows: (a) any application….implement the ~~g~~Good ~~m~~Management ~~p~~Practices…		
PC5LWRP-264A	DairyNZ	Retain Policy 4.41C (b) as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1394	Fertiliser Association of New Zealand	Amend Policy 4.41C (b) as follows: (b) discharge permits granted to irrigation schemes or principal water suppliers to be subject to conditions require reporting of N loss calculations and where practicable not exceeding~~that restrict the total nitrogen loss to a limit not exceeding~~:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-117A	Hunter Downs	Amend Policy 4.41C(b) by inserting a new clause as follows:	Accept in part	In response to this and other submissions we recommend an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Development Company Limited	the nitrogen loss that 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); or		amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-677B	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41C(b) by inserting a new clause as follows: the nitrogen loss that 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); or		
PC5LWRP-630C	Central Plains Water Ltd	Amend Policy 4.41C(b) by inserting a new clause as follows: the nitrogen loss that 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); or		
PC5LWRP-192A	Dairy Holdings Limited	Amend Policy 4.41C(b) by inserting a new clause as follows: the nitrogen loss that 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); or		
PC5LWRP-1007A PC5LWRP-658A	Amuri Irrigation Co Limited Rangitata Diversion Race Management Limited	Amend Policy 4.41C, clause (b)(i) as follows, either: (i) over time , the Baseline GMP Loss Rate for any … OR (i) by the timeframe set out in Policy 4.38C , the Baseline GMP Loss Rate for any … OR (i) by the timeframe set out in policies 4.37, 4.38 and 4.38AA , the Baseline GMP Loss Rate for any … AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2297	Federated Farmers of New Zealand	Amend Policy 4.41C (b)(i), as follows: (i) the Baseline GMP Loss Rate for any land within the Red ~~,~~or Lake ~~or Orange~~ Nutrient Allocation Zones; and	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-836	Opuha Water Limited	Amend Policy 4.41C(b)(i) as follows: (i) the Baseline GMP Loss Rate for any land within the Red, Lake or Orange Nutrient Allocation Zones unless the nitrogen baseline has been lawfully exceeded prior to 13 February 2016 ; and .. Or words to similar effect.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-2126A	Irrigation New Zealand Inc	Delete Policy 4.41C(b)(ii)	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2297A	Federated Farmers of New Zealand	Amend Policy 4.41C (b)(ii), as follows: (ii) a total of 5 kg/ha/year above the Baseline GMP ~~l~~Loss ~~r~~Rate for any land within the Orange, Green or Light Blue Allocation Zones.	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-677D	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41C(b)(ii) as follows: in the case of~~a total of 5kg/ha/yr above the Baseline GMP loss rate for~~ any land within the Green or Light Blue Allocation Zones , a Good Management Practice Loss Rate based on the	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		proposed irrigated land use and spray irrigation with an efficiency of 80% .		instruments.
PC5LWRP-630E	Central Plains Water Ltd	Amend Policy 4.41C(b)(ii) as follows: in the case of~~a total of 5kg/ha/yr above the Baseline GMP loss rate for~~ any land within the Green or Light Blue Allocation Zones , a Good Management Practice Loss Rate based on the proposed irrigated land use and spray irrigation with an efficiency of 80% .		
PC5LWRP-192D	Dairy Holdings Limited	Amend Policy 4.41C(b)(ii) as follows: in the case of~~a total of 5kg/ha/yr above the Baseline GMP loss rate for~~ any land within the Green or Light Blue Allocation Zones , a Good Management Practice Loss Rate based on the proposed irrigated land use and spray irrigation with an efficiency of 80% .		
PC5LWRP-117B	Hunter Downs Development Company Limited	Amend Policy 4.41C(b)(ii) as follows: in the case of~~a total of 5kg/ha/yr above the Baseline GMP loss rate for~~ any land within the Green or Light Blue Allocation Zones , a Good Management Practice Loss Rate based on the proposed irrigated land use and spray irrigation with an efficiency of 80% .		
PC5LWRP-1007B PC5LWRP-658B	Amuri Irrigation Co Limited Rangitata Diversion Race Management Limited	Amend Policy 4.41C, clause (b)(ii) as follows, either: (ii) over time , a total of 5kg/ha/yr … OR (ii) by the timeframe set out in Policy 4.38C , a total of 5kg/ha/yr ... OR (ii) by the timeframe set out in policies 4.37, 4.38 and 4.38AA , a total of 5kg/ha/yr … AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Policy 4.41D

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1010	Amuri Irrigation Co Limited	Retain Policy 4.41D as notified.	Accept	We agree that retaining the policy is appropriate.
PC5LWRP-302	DairyNZ	Retain Policy 4.41D as notified.		
PC5LWRP-2300	Federated Farmers of New Zealand	Retain Policy 4.41D as notified.		
PC5LWRP-1410	Fertiliser Association of New Zealand	Retain Policy 4.41D as notified.		
PC5LWRP-2130	Irrigation New Zealand Inc	Retain Policy 4.41D as notified.		
PC5LWRP-1764	Ravensdown Limited	Retain Policy 4.41D as notified.		
PC5LWRP-664	Rangitata Diversion Race Management Limited	Retain Policy 4.41D as notified.		
PC5LWRP-2859	McLean G and M	Delete Policy 4.41D.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives
PC5LWRP-2887	Forrester J and R	Delete Policy 4.41D.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2824	Sloss K	Delete Policy 4.41D.		and for giving effect to the superior instruments.
PC5LWRP-2907	Forrester K	Delete Policy 4.41D.		
PC5LWRP-2925	Rangatahi Downs Land Trust	Delete Policy 4.41D.		
PC5LWRP-2867	Hoban J K W	Delete Policy 4.41D.		
PC5LWRP-2943	Murchison JG and LM	Delete Policy 4.41D.		
PC5LWRP-2960	Munro A R and K H	Delete Policy 4.41D.		
PC5LWRP-2806	Maungatahi Farm Limited	Delete Policy 4.41D.		
PC5LWRP-542	Egg Producers Federation and Poultry Industry Association	Amend Policy 4.41D to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-632 PC5LWRP-193 PC5LWRP-120 PC5LWRP-679	Central Plains Water Ltd Dairy Holdings Limited Hunter Downs Development Company Limited Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41D(a) as follows: (a) how the nutrient load for which resource consent is sought has been calculated, and the rationale for that nutrient load applied, including whether the nutrient losses from properties that are only partially irrigated by the scheme or principal water supplier are proposed to be fully accounted for by the scheme ; and	Accept in part	In response to this and other submissions we recommend an amendment to Policy 4.41C to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-679B	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41D(a) as follows if the relief sought in PC5LWRP-656 is accepted: and excluding properties irrigation by the scheme that are less than 10 hectares, or irrigate less than 50 hectares or winter graze less than 20 hectares.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-632A PC5LWRP-193A PC5LWRP-120A PC5LWRP-679A	Central Plains Water Ltd Dairy Holdings Limited Hunter Downs Development Company Limited Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41D(b) as follows: (b) how nutrients from all ~~land subject to~~ properties supplied with water under any permit granted to the scheme or principal water supplier will be accounted for , including whether the nutrient losses from properties that are only partially irrigated by the scheme or principal water supplier are proposed to be fully accounted for by the scheme or managed by the individual property ; and…..	Accept in part	In response to this and other submissions we recommend an amendment to Policy 4.41C to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-679C	Barrhill Chertsey Irrigation Scheme	Amend Policy 4.41D(b) as follows if the relief sought in PC5LWRP-656 is accepted: and excluding properties irrigation by the scheme that are less than 10 hectares, or irrigate less than 50 hectares or winter graze less than 20 hectares.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1815	Forest and Bird NZ	Amend Policy 4.41D by inserting the following clause:	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		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.		
PC5LWRP-1815A	Forest and Bird NZ	Amend Policy 4.41D by inserting the following clause: excluding cattle, deer and pigs from permanent waterbodies and intermittent waterbodies with an active bed greater than 1m.	Reject	Provisions in the LWRP already address these matters.
PC5LWRP-1283	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Policy 4.41D, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Section 5
New Region Wide Rules Sought

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1160	Fonterra Co-operative Group Ltd	Insert new discretionary activity rules for farming enterprises in each nutrient management zone [that use 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; AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2053A	Ravensdown Limited	Develop a consenting pathway to provide an alternative to the consenting pathway presented using the proxies. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-1771B	Ravensdown Limited	Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled.		
PC5LWRP-1853A	Fonterra Co-operative Group Ltd	Provide an alternative pathway for considering consent applications for farming activities to farm at GMP that does not rely on the Farm Portal.		
PC5LWRP-2166	Irrigation New Zealand Inc	Insert new rule as follows: In addition to rule 5.41A, the use of land for a farming activity in a Green or Light Blue zone where: 1. The land is subject to a water permit that authorises the use of water for irrigation and: a. The permit is subject to conditions that require the implementation of Good Management Practices b. The permit is subject to conditions which require the preparation and implementation of a plan to mitigate the effects of the loss of nutrients to water Is a permitted activity.	Reject	To the extent that the requested amendment would apply outside the Waitaki, we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1210	Amuri Irrigation Co Limited	Insert a new [region wide] rule as follows: Within the Red, Orange, Green, Light Blue or Lake Zone nutrient allocation zones, the use of land for a farming activity is a discretionary activity provided the following conditions are met: 1. The nitrogen loss is to be managed by an irrigation scheme or principal water supplier; 2. A Environment Management Strategy that accords with Policy 4.41D has been prepared and lodged with the resource consent application;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

		3. The timeframes for achieving the Good Management Practices Loss Rate or Baseline GMP Loss Rate are set out in the resource consent application lodged with the CRC. AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-745	Rangitata Diversion Race Management Limited	Insert a new rule into 'Section 5: Region-wide Rules' as follows: Within the Red, Orange, Green, Light Blue or Lake Zone nutrient allocation zones, the use of land for a farming activity is a discretionary activity provided the following conditions are met: 1. The nitrogen loss is to be managed by an irrigation scheme or principal water supplier; 2. A Environment Management Strategy that accords with Policy 4.41D has been prepared and lodged with the resource consent application; 3. The timeframes for achieving the Good Management Practices Loss Rate or Baseline GMP Loss Rate are set out in the resource consent application lodged with the CRC."; AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We are not persuaded that the alternative nutrient management regime requested by the submitter would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-328	DairyNZ	Insert new rule as follows: 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: 1. A Farm Environment Plan has been prepared for the property in accordance with Part A of Schedule 7 and is submitted with the 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.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-226	Dairy Holdings Limited	Insert new rule: 5.45B 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, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 2 of Rule 5.46A is a discretionary activity, provided the following conditions are met: 1 A Farm Environment Plan has been prepared for the property in accordance with part A of Schedule 7 and is submitted with the application for resource consent; and 2 The nitrogen loss calculation for the part of the property within the Red Nutrient Allocation Zones does not exceed: i) the nitrogen baseline; or ii) 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 3. the applicant for resource consent can show that the Farm Portal does not provide accurate or realistic Baseline GMP Loss rates for the farming activity undertaken; and 4. good management practices and the matters set out in Schedule 28 are being achieved.		
PC5LWRP-683	Barrhill Chertsey Irrigation Scheme	Include a new Rule: Nutrient User Groups [x] The use of land for a farming activity on a property that forms part of a Nutrient User Group is a discretionary activity, provided the following conditions are met: 1. A management plan is submitted with the application for resource consent, which sets out:	Reject	To the extent that the requested amendment would apply outside the Waitaki, we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

		a. the properties forming the Nutrient User Group; and b. a map showing the location of all properties forming part of the Nutrient User Group; and c. the legal description of all properties and the legal names of the property owners forming part of the Nutrient User Group; and d. the method by which nitrogen losses will be managed and accounted for within the Nutrient User Group; and e. the method by which nitrogen losses will be redistributed upon any property or any part of any property withdrawing from the Nutrient User Group; and 2. A Farm Environment Plan has been prepared for each property in the Nutrient User Group in accordance with Schedule 7 and is submitted with the application for resource consent; and 3. The nitrogen loss calculation for the Nutrient User Group does not exceed the combined total of: a. for the properties that do not receive water from an irrigation scheme or principal water supplier: i. until 30 June 2020, the nitrogen baseline; and ii. from 1 July 2020, the Baseline GMP Loss Rate, plus any increase lawfully permitted by this plan; and b. for the properties that do receive water from an irrigation scheme or principal water supplier, where that irrigation scheme or principal water supply holds a resource consent that controls nutrient loss from properties supplied, the amount specified for those properties by that resource consent.		
PC5LWRP-200	Dairy Holdings Limited	Include a new Rule: Nutrient User Groups [x] The use of land for a farming activity on a property that forms part of a Nutrient User Group is a discretionary activity, provided the following conditions are met: 1. A management plan is submitted with the application for resource consent, which sets out: a. the properties forming the Nutrient User Group; and b. a map showing the location of all properties forming part of the Nutrient User Group; and c. the legal description of all properties and the legal names of the property owners forming part of the Nutrient User Group; and d. the method by which nitrogen losses will be managed and accounted for within the Nutrient User Group; and e. the method by which nitrogen losses will be redistributed upon any property or any part of any property withdrawing from the Nutrient User Group; and 2. A Farm Environment Plan has been prepared for each property in the Nutrient User Group in accordance with Schedule 7 and is submitted with the application for resource consent; and 3. The nitrogen loss calculation for the Nutrient User Group does not exceed the combined total of: a. for the properties that do not receive water from an irrigation scheme or principal water supplier: i. until 30 June 2020, the nitrogen baseline; and ii. from 1 July 2020, the Baseline GMP Loss Rate, plus any increase lawfully permitted by this plan; and b. for the properties that do receive water from an irrigation scheme or principal water supplier, where that irrigation scheme or principal water supply holds a resource consent that controls nutrient loss from properties supplied, the amount specified for those properties by that resource consent.		

Section 5 - Region-wide Rules

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1221	Claremont Farms Ltd	Amend rules to exclude dry stock farms larger than 10 ha, who are not irrigating and fertilise at less than a reasonable prescribed average level of nitrates per hectare.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1029	Banks B	Amend Section 5 Rules to allow properties irrigating more than 50 hectares, but with very low nitrogen losses, more flexibility, considering the requirements to operate within their nitrogen baseline or baseline GMP loss rate.		
PC5LWRP-2643	Craigmore Farming	Amend to adopt a simpler rule framework, specifically the rule framework sought by Waitaki Irrigation Collective [PC5LWRP-790].	Accept in part	These submission points request simplification of the provisions in Plan Change 5. We agree, for the reasons set out in the Section 42A Report, that some amendments to the provisions in Part B of Plan Change 5 are appropriate to remove duplication and improve understanding of the plan change.
PC5LWRP-2635	Kakahu Catchment Group	Amend Rules 5.41A – 5.59A to adopt a simpler rule framework.	Reject	To the extent that the requested amendment would apply outside the Waitaki, we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1162	Craigmore Farming	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2059	Kakahu Catchment Group	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor'.		
PC5LWRP-1150	Cameron W N and S P	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor'.		
PC5LWRP-1174	Keeling Dairies Ltd	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-892	Kokoamo Farms Limited	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-896	Spectrum Group	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-2187	Sloss K	Submitter opposes Rules - no specific rules stated.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-2725	Arnstead Organic Farm	Submitter opposes reliance on numeric limits based on OVERSEER® nutrient model.	Reject	These submission points request the omission of provisions that incorporate the OVERSEER® model or the Farm Portal as the method for estimating nitrogen losses from a farming activity (or in the case of the Farm Portal nitrogen losses under

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				good management practice). We consider the omission of these provisions would unjustifiably weaken the effectiveness of the plan change and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1240	McFadden J R	Delete all mandatory portal and management plan requirements and replace with a working with landowner model based on the successful catchment board approach.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Replacement Rules Sought

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2547 PC5LWRP-2439A PC5LWRP-2316A PC5LWRP-1957 PC5LWRP-2323 PC5LWRP-2109	Munro A R and K H Forrester K McLean G and M Murchison JD and LM Rangatahi Downs Land Trust Sloss K	Delete Rule 5.43A and replace with our proposed permitted activity rule 5.44A.	Reject	We are not persuaded that the alternative nutrient management regime requested by the submitter would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1635	Banks J and T	Delete Rule 5.44A and replace with: Within the Red Nutrient Allocation Zone, any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality- September 2015 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property Any farming activity which does not comply with conditions (2) and (3) is a permitted activity if it is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality-2015; and the estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity.		
PC5LWRP-2532 PC5LWRP-2140	Maungatahi Farm Limited Sloss K	Delete Rule 5.44A and replace with the following: Within the Red Nutrient Allocation Zones, any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed 15kg/ha/yr in a Red Zone		
PC5LWRP-2455	Forrester K	Delete Rule 5.44A and replace with the following: Within, Red Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on fodder crops on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 15kg/ha/yr in a Red Zone OR as an alternative: 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above.		
PC5LWRP-2461 PC5LWRP-2329 PC5LWRP-2565 PC5LWRP-1891 PC5LWRP-2346	Forrester J and R McLean G and M Munro A R and K H Murchison JG and LM Rangatahi Downs Land Trust	Delete Rule 5.44A and replace with the following: 1. Within, Red Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and (iii) The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. 2. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		(ii) The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 15kg/ha/yr in a Red Zone OR as an alternative to (ii): The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above OR as a second preferred option to Rule 2 above: Any farming activity which is not a permitted activity is a controlled activity if it complies with the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity; Any application made under this rule shall not be notified or require the written approval of affected parties. The consent authority shall reserve its control over the following matters: (i) The maximum nitrogen loss allowed for the farming activity		
PC5LWRP-2480 PC5LWRP-2598 PC5LWRP-2372 PC5LWRP-2574 PC5LWRP-2008 PC5LWRP-2365	Forrester J and R Maungatahi Farm Limited McLean G and M Munro A R and K H Murchison JG and LM Rangatahi Downs Land Trust	Delete Rules 5.44B-5.48A and replace with the following: Within the Red Nutrient Allocation Zones, any farming activity which is not a permitted or controlled activity is a restricted discretionary activity if it complies with all of the following conditions: (i) A Farm Environment Plan has been prepared for the property in accordance with Schedule 7; and (ii) Until 30 June 2020 the nitrogen loss calculation for the property or that part of the property contained within a Red Nutrient Allocation Zone does not exceed the nitrogen baseline and from 01 July 2020 the Baseline GMP Loss Rate; and (iii) Any change of land use does not result in any increase in the lesser of the Baseline GMP Loss Rate for the property under the current farming activity and the estimated Baseline GMP Loss Rate for the property as a result of the land use change. Any application made under this rule shall not be notified and shall not require the written approval of affected parties. The consent authority shall restrict its discretion to all of the following matters: (a) The need for auditing of the Farm Environment Plan and the commencement date and frequency of any such audits; (b) The content, quality and accuracy of the estimated Nitrogen Baseline and Baseline GMP Loss Rates submitted with the application; (c) The adequacy of any mitigation measures in the Farm Environment Plan to mitigate effects of nitrogen or phosphorous/sediment loss and for ensuring Baseline GMP Loss Rates will be achieved; (d) Where applicable, methods to prevent any exceedance of the relevant nutrient load limits set out for that catchment in sections 6 to 15 of the Plan; and (e) With any change of land use, the ability of the applicant to make any further reductions in nitrogen losses above Baseline GMP Loss Rates if required under the provisions in sections 6 to 15 of the plan. 2. Any activity that does not comply with this rule shall be a non-complying activity.		
PC5LWRP-2506	Forrester J and R	Delete Rules 5.50A-5.52A and replace with the following provisions:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2421 PC5LWRP-2599 PC5LWRP-2077 PC5LWRP-2420	McLean G and M Munro A R and K H Murchison JG and LM Rangatahi Downs Land Trust	Within the Lake Sensitive Zones, any farming activity is a permitted activity if it complies with all of the following conditions: (i) The farming activity is undertaken in accordance with industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) Any land on the property that is within the Lake Sensitive Zone is not irrigated; and (iii) Any land on the property that is within the Lake Sensitive Zone is not used for winter grazing by cattle. 2. Any farming activity which is not a permitted activity is a controlled activity if it complies with the following conditions: (i) A Farm Environment Plan is prepared for the area of the property contained within the Lake Sensitive Zone in accordance with Schedule 7; and (ii) The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity; Any application made under this rule shall not be notified or require the written approval of affected parties. The consent authority shall reserve its control over the following matters: (i) The maximum nitrogen loss allowed for the farming activity; (ii) The need for auditing of the Farm Environment Plan and the commencement date and frequency of any such audits; and (iii) The adequacy of any mitigation measures in the Farm Environment Plan to mitigate effects phosphorous/sediment loss and for ensuring estimated Baseline Nitrogen Loss Rates will be adhered to. 3. Within the Lake Sensitive Zones, any farming activity which is not a permitted or controlled activity is a restricted discretionary activity if it complies with all of the following conditions: (i) A Farm Environment Plan has been prepared for the property in accordance with Schedule 7; and (ii) Until 30 June 2020 the nitrogen loss calculation for that part of the property contained within the Lake Sensitive Zone does not exceed the nitrogen baseline and from 01 July 2020 the Baseline GMP Loss Rate; and (iii) Any change of land use does not result in any increase in the lesser of the Baseline GMP Loss Rate for the property under the current farming activity and the estimated Baseline GMP Loss Rate for the property as a result of the land use change. Any application made under this rule shall not be notified and shall not require the written approval of affected parties. The consent authority shall restrict its discretion to all of the following matters: (a) The effects of the land use on water quality in the receiving environment; (b) The need for auditing of the Farm Environment Plan and the commencement date and frequency of any such audits; (c) The content, quality and accuracy of the estimated Nitrogen Baseline and Baseline GMP Loss Rates submitted with the application; (d) The adequacy of any mitigation measures in the Farm Environment Plan to mitigate effects of nitrogen or phosphorous/sediment loss and for ensuring Baseline GMP Loss Rates will be achieved; (e) Where applicable, methods to prevent any exceedance of the relevant nutrient load limits set out for that catchment in sections 6 to 15 of the Plan; and (f) With any proposed change in land use, the ability of the applicant to make any further nitrogen reductions if required in the catchment under the provisions in sections 6 to 15 of the plan.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Any activity that does not comply with this rule shall be a non-complying activity. OR In the alternative reinstate rules 5.49 and 5.50 of the LWRP.		
PC5LWRP-1641	Banks J and T	Delete Rule 5.54A and replace with: Within the Orange Nutrient Allocation Zone, any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality- September 2015 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property Any farming activity which does not comply with conditions 2) and 3) is a permitted activity if it is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality-2015; and the estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity.		
PC5LWRP-2535 PC5LWRP-2143	Maungatahi Farm Limited Sloss K	Delete Rule 5.54A and replace with the following: Within the Orange Nutrient Allocation Zones , any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed 20kg/ha/yr in an Orange Zone.		
PC5LWRP-2459	Forrester K	Delete Rule 5.54A and replace with the following: Within, Orange Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on fodder crops on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 20kg/ha/yr in an Orange, Green or Blue Zone. OR as an alternative: 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above.		
PC5LWRP-2462 PC5LWRP-2333 PC5LWRP-2566 PC5LWRP-1892 PC5LWRP-2347	Forrester J and R McLean G and M Munro A R and K H Murchison JG and LM Rangatahi Downs Land Trust	Delete Rule 5.54A and replace with the following: 1. Within, Orange Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and (iii) The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. 2. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) the estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 20kg/ha/yr in an Orange Zone OR as an alternative to (ii); The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above OR as a second preferred option to Rule 2 above: Any farming activity which is not a permitted activity is a controlled activity if it complies with the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity; Any application made under this rule shall not be notified or require the written approval of affected parties. The consent authority shall reserve its control over the following matters: (i) The maximum nitrogen loss allowed for the farming activity		
PC5LWRP-2487 PC5LWRP-2604	Forrester J and R Maungatahi Farm	Delete Rules 5.54B-5.56AB and replace with the following: Within the Orange Nutrient Allocation Zones, any farming activity which is not a permitted or controlled activity is a restricted discretionary activity if it complies with all of the following		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2387 PC5LWRP-2583 PC5LWRP-2023 PC5LWRP-2389	Limited McLean G and M Munro A R and K H Murchison JG and LM Rangatahi Downs Land Trust	conditions: (i) A Farm Environment Plan has been prepared for the property in accordance with Schedule 7;and (ii) Until 30 June 2020 the nitrogen loss calculation for the property or that part of the property contained within an Orange Nutrient Allocation Zone does not exceed the nitrogen baseline and from 01 July 2020 the Baseline GMP Loss Rate; and (iii) Any change of land use does not result in any increase in the lesser of the Baseline GMP Loss Rate for the property under the current farming activity and the estimated Baseline GMP Loss Rate for the property as a result of the land use change. Any application made under this rule shall not be notified and shall not require the written approval of affected parties. The consent authority shall restrict its discretion to all of the following matters: (a) The need for auditing of the Farm Environment Plan and the commencement date and frequency of any such audits; (b) The content, quality and accuracy of the estimated Nitrogen Baseline and Baseline GMP Loss Rates submitted with the application; (c) The adequacy of any mitigation measures in the Farm Environment Plan to mitigate effects of nitrogen or phosphorous/sediment loss and for ensuring Baseline GMP Loss Rates will be achieved; (d) Where applicable, methods to prevent any exceedance of the relevant nutrient load limits set out for that catchment in sections 6 to 15 of the Plan; and (e) With any change of land use, the ability of the applicant to make any further reductions in nitrogen losses above Baseline GMP Loss Rates if required under the provisions in sections 6 to 15 of the plan. 2. Any activity that does not comply with this rule shall be a non-complying activity		
PC5LWRP-1975 PC5LWRP-2133 PC5LWRP-2338 PC5LWRP-2529 PC5LWRP-2562 PC5LWRP-2458 PC5LWRP-2322 PC5LWRP-2451	Murchison JG and LM Sloss K Rangitahi Downs Land Trust Maungatahi Farm Limited Munro A R and K H Forrester J and R McLean G and M Forrester K	Delete Rule 5.57A and replace with our proposed permitted activity rule sought in Rule 5.57B.		
PC5LWRP-1643	Banks J and T	Delete Rule 5.57B and replace with: Within the Green and Light Blue Nutrient Allocation Zone, any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality- September 2015		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property Any farming activity which does not comply with conditions 2) and 3) is a permitted activity if it is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality-2015; and the estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity.		
PC5LWRP-2348 PC5LWRP-2463 PC5LWRP-1904 PC5LWRP-2349	McLean G and M Forrester J and R Murchison JG and LM Rangatahi Downs Land Trust	Delete Rule 5.57B and replace with: 1. Within, Green or Light Blue Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and (iii) The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. 2. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: (i)The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii)The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 20kg/ha/yr in a Green or Blue zone OR as an alternative to (ii): The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above OR as a second preferred option to Rule 2 above: Any farming activity which is not a permitted activity is a controlled activity if it complies with the following conditions: (i) The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity; Any application made under this rule shall not be notified or require the written approval of affected parties. The consent authority shall reserve its control over the following matters: (i) The maximum nitrogen loss allowed for the farming activity		
PC5LWRP-2460	Forrester K	Delete Rule 5.57B and replace with: Within, Green or Light Blue Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on fodder crops on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 20kg/ha/yr in an Orange, Green or Blue Zone. OR as an alternative: 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above.		
PC5LWRP-2146 PC5LWRP-2539	Sloss K Maungatahi Farm Limited	Delete Rule 5.57B and replace with the following: Within the Green or Light Blue Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed 20kg/ha/yr in a Green or Light Blue Zone		
PC5LWRP-2567	Munro A R and K H	Delete Rule 5.57B and replace with the following: Within, Green and Blue Nutrient Allocation Zones any farming activity is a permitted activity if it complies with all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The area of the property irrigated or authorized to be irrigated by any water permit is less than 50 hectares; and 3. The number for weaned cattle winter grazing on the property does not exceed the lesser of 200 cows or 10% of the area for the property. Any farming activity which does not comply with conditions (2) or (3) is a permitted activity if it meets all of the following conditions: 1. The farming activity is undertaken in accordance with an industry recognized farm		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and 2. The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the following: 15kg/ha/yr in a Green or Blue Zone Or as an alternative to (ii); The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses for any farming activity on the property that could be undertaken as a permitted activity under Rule X above. Or as a second preferred relief to Rule 2 above: Any farming activity which is not a permitted activity is a controlled activity if it complies with the following conditions: (i) The farming activity is undertaken in accordance with an industry agreed recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; and (ii) The estimated nitrogen losses from the farming activity as modelled in OVERSEER® do not exceed the estimated nitrogen losses from any farming activity on the property that could be undertaken as a permitted activity; Any application made under this rule shall not be notified or require the written approval of affected parties. The consent authority shall reserve its control over the following matters: (i) The maximum nitrogen loss allowed for the farming activity		
PC5LWRP-2493 PC5LWRP-2031 PC5LWRP-2404 PC5LWRP-2588 PC5LWRP-2608 PC5LWRP-2401	Forrester J and R Murchison JG and LM McLean G and M Munro A R and K H Maungatahi Farm Limited Rangatahi Downs Land Trust	Delete Rules 5.57C-5.59A and replace with: Within the Green or Blue Nutrient Allocation Zones, any farming activity which is not a permitted or controlled activity is a restricted discretionary activity if it complies with all of the following conditions: (i) The farming activity is undertaken in accordance with industry recognised farm management programme or in accordance with the Industry-Agreed Good Management Practices Relating to Water Quality – September 2015; (ii) Until 30 June 2020 the nitrogen loss calculation for the property or that part of the property contained within a Green or Blue Nutrient Allocation Zone does not exceed the nitrogen baseline and from 01 July 2020 the Baseline GMP Loss Rate. (iii) Any change of land use complies with the Baseline GMP Loss Rate for the new land use. Any application made under this rule shall not be notified and shall not require the written approval of affected parties. The consent authority shall restrict its discretion to all of the following matters: (a) The need for a Farm Environment Plan prepared in accordance with Schedule 7, and the need for auditing of any such Farm Environment Plan, including the commencement date and frequency of audits; (b) The effects of any change of land use on water quality within the receiving environment and the adequacy of any mitigation measures in the Farm Environment Plan to address any potential adverse effects of the land uses on water quality, and for ensuring Baseline GMP Loss Rates will be achieved; (c) Where applicable, methods to prevent any exceedance of the relevant nutrient load limits set out for that catchment in sections 6 to 15 of the Plan; and (d) Where applicable the ability of the applicant to make any further reductions in nitrogen losses above Baseline GMP Loss Rates if required in the catchment under the provisions in sections 6 to 15 of the plan. In the Green and Blue Nutrient Allocation Zones any activity that does not comply with this rule shall be a non-complying activity		

Region-wide Rules

Rule 5.41A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1024	Amuri Irrigation Co Limited	Retain Rule 5.41A as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-303	DairyNZ	Retain Rule 5.41A as notified.		
PC5LWRP-2301	Federated Farmers of New Zealand	Retain Rule 5.41A as notified.		
PC5LWRP-1422	Fertiliser Association of New Zealand	Retain Rule 5.41A as notified.		
PC5LWRP-2136	Irrigation New Zealand Inc	Retain Rule 5.41A as notified.		
PC5LWRP-828	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain Rule 5.41A as notified.		
PC5LWRP-699	Rangitata Diversion Race Management Limited	Retain Rule 5.41A as notified.		
PC5LWRP-1766	Ravensdown Limited	Retain Rule 5.41A as notified.		
PC5LWRP-284	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.41A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-543	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.41A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-680	Barrhill Chertsey Irrigation Scheme	Amend Rule 5.41A as follows: 5.41A Despite Rules 5.43A to ~~5.59A~~ 5.62 (or any sub-regional chapter), the use of land for a farming activity where either:...		
PC5LWRP-633	Central Plains Water Ltd	Amend Rule 5.41A as follows: 5.41A Despite Rules 5.43A to ~~5.59A~~ 5.62 (or any sub-regional chapter), the use of land for a farming activity where either:...		
PC5LWRP-195	Dairy Holdings Limited	Amend Rule 5.41A as follows: 5.41A Despite Rules 5.43A to ~~5.59A~~5.62 (or any sub-regional chapter), the use of land for a farming activity where either:...		
PC5LWRP-122	Hunter Downs Development Company Limited	Amend Rule 5.41A as follows: 5.41A Despite Rules 5.43A to ~~5.59A~~ 5.62 (or any sub-regional chapter), the use of land for a farming activity where either:...		
PC5LWRP-1514	Beef and Lamb New Zealand Ltd	Amend Rule 5.41A(b)(iii) as follows: the water permit is subject to conditions which requires the preparation and implementation of a management plan in accordance with Schedule 7A to mitigate the effects of the loss of	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		nutrients to water.		the superior instruments.
PC5LWRP-697	North Canterbury Fish and Game & SI Fish and Game	Amend Rule 5.41A to include a new clause (c) as follows: c. the land is not subject to a whole of catchment review of resource consents in order to maintain or improve water quality or meet plan limits. AND further or alternative relief to the effect of that sought.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1816	Forest and Bird NZ	Amend Rule 5.41A to address: (a) doesn't have any conditions that manage adverse effects; (b) will not achieve the objectives of the plan. OR Revert to previous Rule 5.41.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-837	Opuha Water Limited	Clarify, through an amendment to, or deletion of Rule 5.41A that: (1) schemes can apply for nutrient discharge consents as set out in Rules 5.60 and 5.62 and where such a consent is held farmers do not need to comply with other land use rules; but (2) schemes do not have to apply for such consents and where they have not, a farmer must comply the other nutrient discharge rules; Or words to similar effect.	Reject	Provisions in the LWRP already address these matters.

Rule 5.42A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2138	Irrigation New Zealand Inc	Retain Rule 5.42A as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-2302	Federated Farmers of New Zealand	Amend Rule 5.42A to reference a minimum area of 10 hectares.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-545	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.42A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-941	Sparrow M	Amend the preamble of Rule 5.42A as follows: Where any property or farming enterprise includes land in more than one Nutrient Allocation Zone, as shown on the Planning Maps:	Accept	In response to this submission we recommend an amendment to the effect requested.
PC5LWRP-304	DairyNZ	Amend Rule 5.42A as follows: Where any property includes land in more than one Nutrient Allocation Zone, as shown on the Planning Maps, and the smaller proportion of that land within a different Nutrient Allocation Zone exceeds 10 hectares in area : Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-682	Barrhill Chertsey Irrigation Scheme	Amend Rule 5.42A(a) as follows: regard shall be had to the rules for each Nutrient Allocation Zone that apply to the property while ensuring that nutrient loss is managed on a whole of property basis.		
PC5LWRP-196	Dairy Holdings Limited	Amend Rule 5.42A(a) as follows: regard shall be had to the rules for each Nutrient Allocation Zone that apply ~~respectively only to the part of~~to the property ~~within that Zone~~while ensuring that nutrient loss is managed on a whole of property basis.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-304A	DairyNZ	Amend Rule 5.42A(b) as follows: (b) where the conditions of Rules 5.43A to 5.59A specify a date by which a resource consent application is to be lodged, and the property is located in more than one Nutrient Allocation Zone, compliance with the earliest date is required , and; Or words to similar effect.		
PC5LWRP-1516	Beef and Lamb New Zealand Ltd	Amend Rule 5.42A(b) as follows: Where the conditions of Rules 5.43A to 5.59A specify a specific date by which a resource consent application is to be lodged, and the property is located in more than one Nutrient Allocation Zone, compliance with the earliest date is required where more than 25 percent of the property is in the relevant zone. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2272	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Rule 5.42A(b) as follows: Where the conditions of Rules 5.43A to 5.59A specify a specific date by which a resource consent application is to be lodged, and the property is located in more than one Nutrient Allocation Zone, compliance with the earliest date is required where more than 25 percent of the property is in the relevant zone. Or words to similar effect.		
PC5LWRP-304B	DairyNZ	Amend Rule 5.42A by inserting a new clause as follows: for the area of that property located within a Nutrient Allocation Zone of less than 10 hectares, the relevant permitted activity rules apply. Or words to similar effect.		

Rule 5.43

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1820	Forest and Bird NZ	Retain Rule 5.43 and retain the requirement for activities that do not comply with Rule 5.43 to be restricted discretionary activities.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Rule 5.43A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-884	Opuha Water Limited	Retain Rule 5.43A as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-1768A	Ravensdown Limited	Retain permitted activity status of Rule 5.43A.		
PC5LWRP-285	Ellesmere Sustainable Agriculture Inc	Retain Rule 5.43A, provided it has precedence over Rule 5.41A.	Accept in part	We agree that retaining the rule is appropriate but we are not persuaded of the precedence request.
PC5LWRP-1821	Forest and Bird NZ	Delete Rule 5.43A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2453	Forrester J and R	Delete Rule 5.43A.		
PC5LWRP-2439	Forrester K	Delete Rule 5.43A.		
PC5LWRP-2316	McLean G and M	Delete Rule 5.43A.		
PC5LWRP-2522	Maungatahi Farm Limited	Delete Rule 5.43A.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2520	Anderson D & K and Anderson B & M	Delete Rule 5.43A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.	Reject	Provisions in plan change 5 and the LWRP already this matter.
PC5LWRP-2494	Holland D G	Delete Rule 5.43A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.		
PC5LWRP-1342	Beef and Lamb New Zealand Ltd	Delete Rule 5.43A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits. OR Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity, and the relevant Good Management Practices are implemented. Or words to similar effect.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected. Further, we are not persuaded that the alternative relief requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1768	Ravensdown Limited	Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good Management Practices. Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Further we consider the requirement for farming activities to implement a management plan in accordance with Schedule 7A appropriately addresses this point.
PC5LWRP-639	Lee D	Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property ~~10~~16.5 hectares or less in area is a permitted activity	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1423	Fertiliser Association of New Zealand	Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good Management Practices.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Further we consider the requirement for farming activities to implement a management plan in accordance with Schedule 7A appropriately addresses this point.
PC5LWRP-829	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity provided that the property is not used for intensive winter grazing.	Reject	We consider the conditions of this rule are sufficient to restrict the intensity of an activity that may occur on the property.
PC5LWRP-2303	Federated Farmers of New Zealand	Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity~~.~~, provided Industry Good Management Practices are applied.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Further we consider the requirement for farming activities to implement a management plan in accordance with Schedule 7A appropriately addresses this point.
PC5LWRP-313	DairyNZ	Amend Rule 5.43A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity, with the expectation that land users will operate at Industry Agreed Good Management Practices. Or words to similar effect.		
PC5LWRP-787	Purata Farming Ltd	Insert a new condition to Rule 5.43A as follows: Industry Good Management Practices are implemented on these land areas		
PC5LWRP-2141	Irrigation New Zealand Inc	Amend Rule 5.43A as follows: Within the Red, Lake and Orange zones the…are a permitted activity provided the following conditions are met:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		1. The property has adopted the relevant industry Good Management Practices		
PC5LWRP-547	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.43A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-2234	Hoban J K W	Delete Rule 5.43A and replace with rules that mean: Farmers are required to use OVERSEER® to model nutrient losses if they have: More than 50 hectares and 10% of property/farming entity irrigated More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle If a nutrient budget is required and produced an estimate of less than 15kg/n/ha in Red Zone then it is a permitted activity.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Rule 5.44

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1369	Beef and Lamb New Zealand Ltd	Delete Rule 5.44 and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Accept in part	Plan Change 5 proposes to delete operative Rule 5.44 and we recommend, for the reasons set out in the Section 42A Report the operative rule be omitted. However, the request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.

Rule 5.44A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-305	DairyNZ	Retain Rule 5.44A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2528	Anderson D & K and Anderson B & M	Delete Rule 5.44A and adopt a catchment board model.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1370	Beef and Lamb New Zealand Ltd	Delete Rule 5.44A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-286	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.44A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1822	Forest and Bird NZ	Delete Rule 5.44A AND retain Rule 5.43.		
PC5LWRP-2249	Hoban J K W	Delete Rule 5.44A and replace with rules that mean: Farmers are required to use OVERSEER® to model nutrient losses if they have: More than 50 hectares and 10% of property/farming entity irrigated More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		If a nutrient budget is required and produced an estimate of less than 15kg/n/ha in Red Zone then it is a permitted activity.		
PC5LWRP-1771	Ravensdown Limited	Amend Rule 5.44A to: 1) Require a nutrient budget to be updated after three years, unless there is a significant farm system change; 2) Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; 3) Provide an additional formal process for reviewing and moderating inaccurate portal results; 4) Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; 5) Address the concerns raised regarding the definition of winter grazing; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	In response to (1) (2) (3) and (5) of this submission point we recommend an amendment to the plan change, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions. In relation to (4) we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1018	Banks B	Amend Rule 5.44A to apply a more logical approach to resolving problems.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1313	Chisnall W G S	Amend Rule 5.44A to exclude coastal areas from the requirement to have a Management Plan.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1654	Horticulture New Zealand	Amend Rule 5.44A to include "or farming enterprise" after 'property'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-549	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.44A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1364	Johnson B and D	Amend Rule 5.44A to exclude low impact lifestyle blocks of 17 ha, that do not irrigate and do not winter graze.		
PC5LWRP-2142	Irrigation New Zealand Inc	Amend Rule 5.44A as follows: Within the Red, Lake and Orange zones…	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-641	Lee D	Amend Rule 5.44A as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity on a property greater than ~~10~~16.5 hectares in area is a permitted activity provided the following conditions are met:	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1284	Stackhouse Farm	Amend Rule 5.44A to set thresholds of 100 ha for irrigated land and 100 ha for winter grazing.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2259	Nutrient Solutions Ltd	Amend Rule 5.44A to exclude perennial crops from any conditions involving irrigated area.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1139	Haldon Station Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-957	Killermont Station 2012 Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1441	Mackenzie Irrigation Company Ltd	Amend Rule 5.44A to exclude the use of narratives and instead use a percentage of the total farm area.		
PC5LWRP-998	Rietveld J A	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1118	Twinburn Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-232	Bellfield Land Co Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-2638	Craigmore Farming	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-2629	Kakahu Catchment Group	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-827	Waitaki Irrigators Collective Ltd	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing. Submitter seeks new rule framework in Part B - Section 15B and requests that region-wide rules be amended to this effect.		
PC5LWRP-833	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.44A to achieve a revision of the 20ha permitted baseline for winter grazing to manage the effects on the receiving environment.		
PC5LWRP-2507	Holland D G	Submitter opposes Rule 5.44A and seeks to amend to achieve voluntary farm plans and GMP related [rather than threshold] winter grazing rules.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1329	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.44A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.		
PC5LWRP-2507B	Holland D G	Submitter opposes Rule 5.44A and seeks adoption a catchment board model.		
PC5LWRP-441	Ballance Agri-Nutrients Limited	Amend Rule 5.44A(1) as follows: ...and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24 months~~36 months thereafter, unless there is a material change to the farm system ; and...	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-641A	Lee D	Amend Rule 5.44A(1) as follows: The property is registered in the Farm Portal by 1 July ~~2017~~2020 and information about the farming…	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-944	Sparrow M	Amend Rule 5.44A (1) to include the following: or, is registered in the Farm Portal after (the respective dates) within 6 months of any change in landownership or management which results in the creation of a new qualifying property Or add statements to similar effect.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2142A	Irrigation New Zealand Inc	Amend Rule 5.44A(1) as follows: 1. … every 60 months thereafter	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-197	Dairy Holdings Limited	Amend Rule 5.44A(1) to refer to "1 July 201 ~~7~~8 "	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1424	Fertiliser Association of New Zealand	Amend Rule 5.44A(1) as follows: 1. The property is registered in the Farm Portal by 1 July 20 ~~17~~ 18 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~ 36 months thereafter or upon a significant farm system change ; and...	Accept in part	
PC5LWRP-1771A	Ravensdown Limited	Amend Rule 5.44A(1) as follows: The property is registered in the Farm Portal by 1 July ~~2017~~2018 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a material farm system change ; and .. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-2507C	Holland D G	Delete Rule 5.44A(1) as an appropriate condition for a permitted activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-862	Opuha Water Limited	Amend Rule 5.44A(2) as follows: The area of the property ~~authorised to be~~ irrigated with water is less than 50 hectares.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1370A	Beef and Lamb New Zealand Ltd	Amend Rule 5.44A(2) as follows: The area of the property authorised to be irrigated with water is less than 50 hectares and 10 percent of the property;	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-357	Moir Farms Maimai Limited	Delete Rule 5.44A(2) and replace with a percentage of farms with irrigation rather than 50 hectare value.		
PC5LWRP-862A	Opuha Water Limited	Amend Rule 5.44A(3) as follows: For any property where, as at 13 February 2016, the area of ~~land authorised to be~~the property irrigated with water is less than 50 hectares, any increase in the area of the property~~of~~ irrigated ~~land~~ is limited to 10 hectares above that which was irrigated at 13 February 2016." Or words to similar effect.	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2142C	Irrigation New Zealand Inc	Delete Rule 5.44A(3).	Reject	The omission of this condition would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-197A	Dairy Holdings Limited	Delete Rule 5.44A(3).		
PC5LWRP-1424A	Fertiliser Association of New Zealand	Delete Rule 5.44A(3).		
PC5LWRP-833A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Delete Rule 5.44A(3).		
PC5LWRP-1081	Giles M	Delete Rule 5.44A(4) and replace with assessment based on Good Management Practice and the Farm Portal.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1227	Claremont Farms Ltd	Amend Rule 5.44A(4) so that the area of permitted green feed cultivation is commensurate		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		with the overall farmed land area or there should be a maximum permitted fertiliser application per hectare.		
PC5LWRP-705	Johnston R H M	Amend Rule 5.44A(4) to delete 20 ha value and amend to take into consideration the size of the property.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-438	Strathnea Downs Ltd	Amend Rule 5.44A (4) to delete the reference to 20 hectares, and replace with 10% of the total property be available for winter grazing.		
PC5LWRP-1447	Hurunui SNA Group & Rural Advocacy	Amend Rule 5.44A (4) to exclude the reference to 20 hectares, and manage intensive grazing cattle either by: 1) the use of voluntary farm plans and education; OR 2) permit winter grazing so long as it meets practical farmer agreed GMPs.		
PC5LWRP-924	Sparrow M	Amend Rule 5.44A (4) as follows: The ~~area of the~~ property is not used for winter grazing ~~within the period 1 May to 1 September does not exceed a total of 20 hectares~~ ; and	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-698	North Canterbury Fish and Game & SI Fish and Game	Amend Rule 5.44A(4) as follows: 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 , any increase in the area of winter grazing is limited to 10 hectares above that which was winter grazed at 13 February 2016 ; AND further or alternative relief to the effect of that sought.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1370B	Beef and Lamb New Zealand Ltd	Amend Rule 5.44A(4) as follows: The area of any property used for winter grazing within the period 1 May to 1 September does not exceed a total of ~~20~~50 hectares and 10% of the property ; and…	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-129	Forrester M and G	Amend Rule 5.44A(4) by deleting the reference to 20 hectares and replace with a percentage of the total farmed area, e.g. 10% for winter crops.		
PC5LWRP-2259A	Nutrient Solutions Ltd	Amend Rule 5.44A(4) to explain what 20 ha of winter grazing means in respect of crop type and farming systems and consider replacing the prescribed area with a % value for larger farms and development of a different approach for smaller farms. Submitter suggests 10% and/or maximum number of cattle for any property > 50ha.		
PC5LWRP-357A	Moir Farms Maimai Limited	Delete Rule 5.44A(5) and replace with a percentage of farms that can have winter crops grazed.		
PC5LWRP-2305	Federated Farmers of New Zealand	Delete Rule 5.44A(5) and replace with the following: All farming activities to achieve Industry GMP by 30 June 2020.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-789	Purata Farming Ltd	Delete Rule 5.44A(5) and replace with the following: Industry Good Management Practices are implemented on these land areas.		
PC5LWRP-2142D	Irrigation New Zealand Inc	Delete Rule 5.44A(5).		
PC5LWRP-2142B	Irrigation New Zealand Inc	Amend Rule 5.44A by inserting the following as a new condition: The property has adopted the relevant industry Good Management Practices		
PC5LWRP-833B	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming	Amend Rule 5.44A by inserting the following as a new condition: The nitrogen loss calculation for the property does not exceed 10kgs per hectare annum; and		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited			

Rule 5.44B

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1778	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the controlled activity status of Rule 5.44B as notified.	Accept	We agree that retaining controlled activity status is appropriate.
PC5LWRP-550	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.44B to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2144	Irrigation New Zealand Inc	Amend Rule 5.44B as follows: Within the Red, Lake and Orange zones…	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1659	Horticulture New Zealand	Amend Rule 5.44B as follows: Insert "or farming enterprise" after 'property';	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1052	Dave Ashby Rural Consultants Limited	Amend Rule 5.44B to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1330	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.44A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-287	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.44B.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1823	Forest and Bird NZ	Delete Rule 5.44B.		
PC5LWRP-1373	Beef and Lamb New Zealand Ltd	Delete Rule 5.44B and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1778A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.44B(2) to: ○ Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; ○ Provide an additional formal process for reviewing and moderating inaccurate portal results; ○ Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent. Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1502	Fertiliser Association of New Zealand	Amend Rule 5.44B(2) to provide for farm systems which cannot use the Farm Portal.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1030	Amuri Irrigation Co Limited	Amend Rule 5.44B(2) as follows: Delete references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.	Reject	We adopt the recommendations and reasons set out in the section 42A Report.
PC5LWRP-314	DairyNZ	Amend Rule 5.44B(2) as follows: ~~Until 30 June 2020, t~~T he 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 the~~ Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP from 1 July 2020 ; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. However, other amendments we are recommending that provide for the use of equivalent good management practice loss rates address this issue.
PC5LWRP-708	Rangitata Diversion Race Management Limited	Amend Rule 5.44B (2) to delete the references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-353	Dairy Holdings Limited	Amend Rule 5.44B(2) as follows: 2. Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Red Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline, ; or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss rate; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-849	Opuha Water Limited	Amend Rule 5.44B(3) by either: Moving condition 5.44B(3) into one of the matters over which the CRC reserves control for the rule. OR Adding the words ...or suitably experienced person at the end of condition 3. OR words to similar effect.	Reject	The requested amendment is uncertain.
PC5LWRP-1373A	Beef and Lamb New Zealand Ltd	Delete Rule 5.44B(3).	Reject	The omission of this condition would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2429	Federated Farmers of New Zealand	Delete Rule 5.44B(3).		
PC5LWRP-791	Purata Farming Ltd	Delete Rule 5.44B(3).		
PC5LWRP-2144A	Irrigation New Zealand Inc	Delete Rule 5.44B(3).		
PC5LWRP-314A	DairyNZ	Delete Rule 5.44B(3).		
PC5LWRP-1659A	Horticulture New Zealand	Delete Rule 5.44B(3).		
PC5LWRP-1030A	Amuri Irrigation Co Limited	Amend Rule 5.44B matter of control (4) as follows: (4) Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate ,and the timeframes for achieving the Baseline GMP Loss Rate; and	Reject	The timeframe for compliance with the Baseline GMP Loss Rate is a condition of entry to the rule. Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-708A	Rangitata Diversion Race Management	Amend Rule 5.44B matter of control (4) to read: (4) Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited	timeframes for achieving the Baseline GMP Loss Rate; and		
PC5LWRP-1030B	Amuri Irrigation Co Limited	Amend Rule 5.44B matter of control (5) as follows: Methods that require the farming activity to … Baseline GMP Loss Rate ,and the timeframes for achieving the Good Management Practice Loss Rate …		
PC5LWRP-708B	Rangitata Diversion Race Management Limited	Amend Rule 5.44B matters of control (5) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate		
PC5LWRP-1225	Canterbury District Health Board	Amend Rule 5.44B, Matters for Control (6) to specify at what level mitigation measures should be implemented. Trigger levels should be set at a point that limit adverse effects on drinking water before they impact on public health.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1030C	Amuri Irrigation Co Limited	Delete Rule 5.44B matter of control (9).	Reject	We recommend an amendment to clarify the circumstances in which this matter of discretion may be exercised.
PC5LWRP-708C	Rangitata Diversion Race Management Limited	Delete Rule 5.44B matter of control (9).		
PC5LWRP-1373B	Beef and Lamb New Zealand Ltd	Insert in Rule 5.44B a new matter for control as follows: The quality of the Farm Environment Plan submitted with the application for resource consent, to meet the requirements of Schedule 7.	Reject	Condition 1 of this rule already addresses this matter.
PC5LWRP-1659B	Horticulture New Zealand	Insert in Rule 5.44B a new matter of control: The preparation and review of the Farm Environment Plan.		
PC5LWRP-2429A	Federated Farmers of New Zealand	Insert in Rule 5.44B a new matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	Condition 1 and matter of control 2 of this rule already address these matters.
PC5LWRP-791A	Purata Farming Ltd	Insert in Rule 5.44B a new matter for control: The quality of the Farm Environment Plan, including whether it has been prepared or reviewed by an Accredited Farm Consultant.	Reject	Condition 1 of this rule already addresses this matter.
PC5LWRP-2144B	Irrigation New Zealand Inc	Insert in Rule 5.44B a new matter of control: The quality of the Farm Environment Plan, including whether it has been prepared or reviewed by an Accredited Farm Consultant		
PC5LWRP-314B	DairyNZ	Insert in Rule 5.44B a new matter of control as follows: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.		
PC5LWRP-835	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.44B to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 4.37(b);	Reject	Matter of control 4 already addresses this matter.

Rule 5.45A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-879	Opuha Water Limited	Retain Rule 5.45A(2) as notified.	Accept	We agree that retaining condition 2 of this rule is appropriate.
PC5LWRP-1824	Forest and Bird NZ	Retain Rule 5.45A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1779	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the restricted activity status of Rule 5.45A.	Accept in part	We agree that retaining a restricted discretionary status for this rule is appropriate.
PC5LWRP-1331	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.45A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-288	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.45A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1377	Beef and Lamb New Zealand Ltd	Delete Rule 5.45A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1056	Dave Ashby Rural Consultants Limited	Amend Rule 5.45A to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2306	Federated Farmers of New Zealand	Amend Rule 5.45A to delete reference to Condition 3 of Rule 5.44B.		
PC5LWRP-552	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.45A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1661	Horticulture New Zealand	Amend Rule 5.45A to include "or farming enterprise" after 'property'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2148	Irrigation New Zealand Inc	Amend Rule 5.45A as follows: Within the Red, Lake and Orange zones…	Reject	Provisions in Plan Change 5 already address rules regulating farming activities in the Lake and Orange Zones.
PC5LWRP-1505	Fertiliser Association of New Zealand	Amend Rule 5.45A(2) to provide for farm system which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1779A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.45A(2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-732	Fonterra Co-operative Group Ltd	Amend Rule 5.45A(2) as follows: 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 greater of the Baseline GMP Loss Rate and 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.		
PC5LWRP-199	Dairy Holdings Limited	Amend Rule 5.54A(2) as follows: 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 Baseline GMP Loss Rate; unless : a. the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful .; or b. 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).	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1049	Amuri Irrigation Co Limited	Amend Rule 5.45A(2) by deleting references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.		We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-318	DairyNZ	Amend Rule 5.45A(2) as follows: 2. Until 30 June 2020, tThe 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 the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP from 1 July 2020; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-712	Rangitata Diversion Race Management Limited	Amend Rule 5.45A(2) to delete references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2148A	Irrigation New Zealand Inc	Amend Rule 5.45A by adding a new condition as follows: (3) Until 30 June 2020, the nitrogen loss calculation for the part of the property in the red, lake or orange zones does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the Baseline GMP Loss Rate a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-712A	Rangitata Diversion Race Management Limited	Amend Rule 5.45A to add new Clause (3) that enables the consideration of farm activities that cannot be accurately modelled by the Farm Portal;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1049A	Amuri Irrigation Co Limited	Amend Rule 4.54A to include a new Condition (3) that enables consideration of farm activities that cannot be accurately modelled by the Farm Portal;		
PC5LWRP-1779B	Ravensdown Limited	Amend Rule 5.45A by inserting a new matter of discretion to consider demonstration of meeting of Good Management Practice;	Reject	Matter of control 4 of this rule already addresses this matter.
PC5LWRP-2306A	Federated Farmers	Amend Rule 5.45A by inserting a new matter of discretion Methods for implementing Industry GMPs		
PC5LWRP-732A	Fonterra Co-operative Group Ltd	Amend Rule 5.45A by inserting a new matter of discretion The determination of the Loss Rate Assessed as Baseline GMP. And make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				accordingly. See also Chapter 9 of this report.
PC5LWRP-839	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.45A by inserting a new matter of discretion as follows: The nitrogen loss rate reductions applicable to the property does not exceed 15kgs per year; and	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.
PC5LWRP-1257	Canterbury District Health Board	Amend Rule 5.45A matter of discretion (3) as follows: The actual or potential adverse effects of the activity on surface and groundwater quality and sources of drinking water and how these will be avoided and mitigated AND 2) Insert a [new] section to explain at what level mitigation measures should be implemented.	Accept in part	In response to this and other submissions we recommend an amendment to the give effect to part of the relief sought, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1049B	Amuri Irrigation Co Limited	Amend Rule 5.45A matter of discretion (5) to read: Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and	Reject	The timeframe by which compliance with the Baseline GMP Loss Rate is to be achieved is an entry condition to the rule.
PC5LWRP-712B	Rangitata Diversion Race Management Limited	Amend Rule 5.45A matter of discretion (5) to read: Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and		
PC5LWRP-318A	DairyNZ	Amend Rule 5.45A matter of discretion (6) as follows: 6. Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate *or Loss Rate Assessed as Good Management Practice*, in any circumstance where that Good Management Practice Loss Rate is less than the Baseline GMP Loss Rate; and… AND/OR 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; AND/OR amend the matters for discretion (5) and (6), to remove specific reference to the Baseline GMP Loss Rate and Good Management Practice Loss Rate and replace with a requirement that the consent applicant will demonstrate how the land use will meet the Industry GMP Practices. Or words to similar effect.	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. The amendments to matters of discretion (5) and (6) would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1049C	Amuri Irrigation Co Limited	Amend Rule 5.45A matter of discretion (6) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate	Reject	Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-712C	Rangitata Diversion Race Management Limited	Amend Rule 5.45A matter of control (6) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate		
PC5LWRP-1049D	Amuri Irrigation Co Limited	Delete Rule 5.45A matter of discretion (10).	Reject	We recommend an amendment to clarify the circumstances in which this matter of discretion may be exercised.
PC5LWRP-712D	Rangitata Diversion Race Management Limited	Delete Rule 5.45A matter of discretion (10) AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-1257A	Canterbury District	Amend Rule 5.45A by inserting a [new] section to explain at what level mitigation measures	Reject	We are not persuaded that the amendment requested would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Health Board	should be implemented.		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.46A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1825	Forest and Bird NZ	Retain Rule 5.46A as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-2308	Federated Farmers of New Zealand	Retain Rule 5.46A as notified.		
PC5LWRP-1780	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the discretionary activity status of Rule 5.46A;	Accept	We agree that retaining a discretionary status for this rule is appropriate.
PC5LWRP-1333	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.46A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information. And make any consequential amendments.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-289	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.46A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1677	Horticulture New Zealand	Delete Rule 5.46A.		
PC5LWRP-1381	Beef and Lamb New Zealand Ltd	Delete Rule 5.46A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1076	Fonterra Co-operative Group Ltd	Amend Rule 5.46A 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate not exceeding the Baseline GMP Loss Rate; and 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 7. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 8. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 9. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 10. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-554	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.46A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2150	Irrigation New Zealand Inc	Amend Rule 5.46A as follows: Within the Red, Lake and Orange zones…	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-331	DairyNZ	Amend Rule 5.46A (2) as follows: Within the Red Nutrient Allocation Zone, the use of land for a farming activity as part of a farming enterprise is a restricted discretionary activity, provided the following conditions are met:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1780A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.46A(2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent. Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-2150A	Irrigation New Zealand Inc	Amend Rule 5.46A(2) as follows: Until 30 June 2020, the nitrogen loss calculation for the farming enterprise in the red, lake or orange zones does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the Baseline GMP Loss Rate a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-331A	DairyNZ	Amend Rule 5.46A (2) as follows: 2. ~~Until 30 June 2020, t~~T he nitrogen loss calculation for the farming enterprise does not exceed the ~~nitrogen baseline and from 1 July 2020 the~~ Good Management Practice Loss Rate or Loss Rate assessed as Good Management Practice from 1 July 2020 ; and Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1510	Fertiliser Association of New Zealand	Amend Rule 5.46A(2) to provide for farm systems which cannot use the Farm Portal.		
PC5LWRP-733	Fonterra Co-operative Group Ltd	Amend Rule 5.46A (2) as follows: 2. Until 30 June 2020, the nitrogen loss calculation [*for the farm enterprise*] does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the greater of the Good Management Practice Loss Rate and the Loss Rate Assessed as Good Management Practice;[*and*]... AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-872	Opuha Water Limited	Amend Rule 5.46(2) as follows: (2) Until 30 June 2020 the nitrogen loss calculation for the farming enterprise does not exceed	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		the nitrogen baseline unless the nitrogen baseline has been lawfully exceeded prior to 13 February 2016; and, from 1 July 2020 the Good Management Practice loss rate; and... Or words to similar effect.		achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-809	Purata Farming Ltd	Amend Rule 5.46A(2) as follows: Until 30 June 2020, the nitrogen loss calculation for the farming enterprise in the red, lake or orange zones does not exceed the nitrogen baseline, and from 1 July 2020 the ~~Good Management Practice Loss Rate~~if it exceeds the Baseline GMP Loss Rate the property has adopted the relevant industries Good Management Practices.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-331B	DairyNZ	Amend Rule 5.46A matters of discretion as follows: Insert matters for discretion outlined in submission point PC5LWRP-318A (Rule 5.45A).	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.47A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-684	Barrhill Chertsey Irrigation Scheme	Retain Rule 5.47A as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-227	Dairy Holdings Limited	Retain Rule 5.47A as notified.		
PC5LWRP-2309	Federated Farmers of New Zealand	Retain Rule 5.47A as notified.		
PC5LWRP-1826	Forest and Bird NZ	Retain Rule 5.47A as notified.		
PC5LWRP-290	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.47A,.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1386	Beef and Lamb New Zealand Ltd	Delete Rule 5.47A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1977	Ravensdown Limited	Amend Rule 5.47A activity status to discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1511	Fertiliser Association of New Zealand	Amend Rule 5.47A from a non-complying activity to a discretionary activity.		
PC5LWRP-999	Rietveld J A	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-556	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.47A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2151	Irrigation New Zealand Inc	Amend Rule 5.47A as follows: ..., or condition 1, 2 or 3 of Rule 5.45A...	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		… conditions 1, 2, 3 or 4 of Rule 5.46A…		objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-333	DairyNZ	Amend Rule 5.47A as follows: 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 1 of Rule 5.44B, or condition 1 of Rule 5.45A, or condition 1 of Rule 5.45B, or use of land for a farming activity as part of a farming enterprise that does not comply with condition 1 or 3 of Rule 5.46A, is a non-complying activity. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-333A	DairyNZ	Amend Rule 5.47A as follows: Include farming activities on a property larger than 10 hectares in area that do not comply with condition 2 of Rule 5.45A, farming activities that are part of a farming enterprise that does not comply with condition 2 of Rule 5.46A.		

Rule 5.48A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1827	Forest and Bird NZ	Retain Rule 5.48A as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-702	North Canterbury Fish and Game & SI Fish and Game	Retain Rule 5.48A as notified. AND further or alternative relief to the effect of that sought.		
PC5LWRP-2153	Irrigation New Zealand Inc	Delete Rule 5.48A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-291	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.48A.		
PC5LWRP-1387	Beef and Lamb New Zealand Ltd	Delete Rule 5.48A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-334	DairyNZ	Delete Rule 5.48A and farming activities which do not meet the criteria default to a non-complying activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-229	Dairy Holdings Limited	Delete Rule 5.48A. OR Amend Rule 5.48A to provide: 5.48A Unless provided by Rule 5.45B, w~~W~~ithin 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, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 2 of Rule 5.46A is a prohibited activity.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-559	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.48A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.		
PC5LWRP-434	Ballance Agri-Nutrients	Amend Rule 5.48A to include a non-complying activity status.	Reject	The amendments requested would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited			provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1685	Horticulture New Zealand	Amend Rule 5.48A from a prohibited activity to a non-complying activity.		
PC5LWRP-2310	Federated Farmers of New Zealand	Amend Rule 5.48A from a prohibited activity to a non complying activity.		
PC5LWRP-1513	Fertiliser Association of New Zealand	Amend Rule 5.48A from a prohibited activity to a discretionary activity. OR Combine with Rule 5.47A as a discretionary activity.		
PC5LWRP-1978	Ravensdown Limited	Amend Rule 5.48A from a prohibited activity to a non-complying activity. AND Provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value; OR such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In relation to that part of the submission point that requests a change to the activity classification in this rule we consider the amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.49

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1828	Forest and Bird NZ	Oppose deletion of Rule 5.49.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.49A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-886	Opuha Water Limited	Retain Rule 5.49A as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-292	Ellesmere Sustainable Agriculture Inc	Retain Rule 5.49A, provided it has precedence over Rule 5.41A.	Accept in part	We agree that retaining the rule is appropriate but we are not persuaded of the precedence request.
PC5LWRP-1988	Ravensdown Limited	Retain permitted activity status of Rule 5.49A.	Accept	We agree that retaining a permitted activity classification in this rule is appropriate.
PC5LWRP-2154	Irrigation New Zealand Inc	Delete Rule 5.49A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1829	Forest and Bird NZ	Delete Rule 5.49A and revert to Rule 5.49		
PC5LWRP-2456	Forrester J and R	Delete Rule 5.49A.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2452	Forrester K	Delete Rule 5.49A.		
PC5LWRP-2525	Maungatahi Farm Limited	Delete Rule 5.49A.		
PC5LWRP-2320	McLean G and M	Delete Rule 5.49A.		
PC5LWRP-2561	Munro A R and K H	Delete Rule 5.49A.		
PC5LWRP-1965	Murchison JG and LM	Delete Rule 5.49A.		
PC5LWRP-2344	Rangatahi Downs Land Trust	Delete Rule 5.49A.		
PC5LWRP-2115	Sloss K	Delete Rule 5.49A.		
PC5LWRP-2521	Anderson D & K and Anderson B & M	Delete Rule 5.49A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.		
PC5LWRP-1389	Beef and Lamb New Zealand Ltd	Delete Rule 5.49A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-2654	Holland D G	Delete Rule 5.49A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.	Reject	The omission of this rule would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-2241	Hoban J K W	Delete Rule 5.49A and replace with rules that mean: • Farmers are required to use OVERSEER® to model nutrient losses if they have: • More than 50 hectares and 10% of property/farming entity irrigated • More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle • If a nutrient budget is required and produced an estimate of less than 10kg/n/ha in a Sensitive Lake Zone Blue then it is a permitted activity.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-561	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.49A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1988A	Ravensdown Limited	Amend Rule 5.49A as follows: "Within the Lake Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good Management Practices." Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-2311	Federated Farmers of New Zealand	Amend Rule 5.49A as follows: Within the Lake Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity , provided Industry Agreed Good Management Practices are applied.		
PC5LWRP-1515	Fertiliser Association of New Zealand	Amend Rule 5.49A as follows: Within the Lakes Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good Management Practices.		
PC5LWRP-335	DairyNZ	Amend Rule 5.49A as follows: Within the Lake Zone, the use of land for a farming activity on a property 10 hectares or less in		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		area is a permitted activity , with the expectation that land users will operate at Industry Agreed Good Management Practices. Or words to similar effect.		
PC5LWRP-843	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.49A as follows: Within the Lake Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity provided that the property is not used for intensive winter grazing.	Reject	We consider the conditions of this rule are sufficient to restrict the intensity of an activity that may occur on the property.

Rule 5.50A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1830	Forest and Bird NZ	Retain Rule 5.50A	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1990	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the restricted [discretionary] activity status of Rule 5.50A.	Accept	We agree that retaining a restricted discretionary status is appropriate.
PC5LWRP-1334	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.50A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2155	Irrigation New Zealand Inc	Delete Rule 5.50A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-293	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.50A, and make any consequential amendments.		
PC5LWRP-1391	Beef and Lamb New Zealand Ltd	Delete Rule 5.50A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1058	Dave Ashby Rural Consultants Limited	Amend Rule 5.50A to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-563	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.50A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2312	Federated Farmers of New Zealand	Amend Rule 5.50A to treat Lake Zones similarly to the way Red Zones were previously treated in the LWRP i.e. allow an N discharge of up to 10 kg/ha/year, as a permitted activity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1517	Fertiliser Association of New Zealand	Amend Rule 5.50A(2) to provide for farm system which cannot use the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				accordingly. See also Chapter 9 of this report.
PC5LWRP-1989	Genesis Energy Limited	Amend Rule 5.50A (2) as follows: Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Lake Zone does not exceed the nitrogen baseline, and from 1 July 2020 the lesser of the Nitrogen Baseline or Baseline GMP Loss Rate. Or any decisions of similar effect and any consequential amendment necessary.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1990A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.50A(2) as follows: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-234	Dairy Holdings Limited	Amend 5.50A(2) as follows: Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Lake Zone does not exceed: (i) the nitrogen baseline , or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss Rate; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-78	Meridian Energy Limited	Amend Rule 5.50A(2) as follows: Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Lake Zone does not exceed the nitrogen baseline, and from 1 July 2020 the lesser of the Nitrogen Baseline or Baseline GMP Loss Rate. Or words to the same effect.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-737	Fonterra Co-operative Group Ltd	Amend Rule 5.50A(2) as follows: 2. Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Lake Zone does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the greater of the Baseline GMP Loss Rate and the Loss Rate Assessed as Baseline GMP.	Reject	The first requested amendment would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. The rest of this submission point requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-336	DairyNZ	Amend Rule 5.50A (2) as follows: 2. ~~Until 30 June 2020, t~~T he nitrogen loss calculation for the part of the property within the Lake Zone does not exceed either the ~~nitrogen baseline, and from 1 July 2020 the~~ Baseline GMP Loss Rate or the Loss Rate Assessed as Baseline GMP from 1 July 2020. Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1262	Canterbury District Health Board	Amend Rule 5.50A Matters of Discretion (3) to read: The actual or potential adverse effects of the activity on surface and groundwater quality and sources of drinking water and how these will be avoided and mitigated ;..	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-737A	Fonterra Co-operative Group Ltd	Amend Rule 5.50A as follows: Insert a new matter of discretion 1A. The determination of the Loss Rate Assessed as Baseline GMP. And make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1990B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Rule 5.50A insert a new matter of discretion to consider demonstration of meeting Good Management Practice; Or such other or alternative wording which would properly address the concerns raised.	Reject	Matter of discretion (4) already addresses this matter.
PC5LWRP-844	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.50A to include an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 4.37(b);	Reject	Matters of discretion (5) and (6) already address these matters
PC5LWRP-336A	DairyNZ	Amend Rule 5.50A matters for discretion to achieve an alternative consenting pathway developed in addition to the requirement to not exceed the Baseline GMP Loss Rate under Rule 5.50A; AND/OR An additional formal process for reviewing and moderating random portal results 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; AND/OR The matters for discretion under Rule 5.50A are amended to remove specific reference to the Baseline GMP Loss Rate and Good Management Practice Loss Rate in matters (5) and (6), and replaced by a requirement that the consent applicant will demonstrate how the land use will meet the Industry GMP Practices.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. The amendments requested to the matters of discretion would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1262A	Canterbury District Health Board	Amend Rule 5.50A as follows: Insert a [new] section to explain at what level mitigation measures should be implemented.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.51A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2313	Federated Farmers of New Zealand	Retain Rule 5.51A as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-1831	Forest and Bird NZ	Retain Rule 5.51A as notified.		
PC5LWRP-2156	Irrigation New Zealand Inc	Delete Rule 5.51A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-294	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.51A.		giving effect to the superior instruments.
PC5LWRP-1392	Beef and Lamb New Zealand Ltd	Delete Rule 5.51A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-565	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.51A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1518	Fertiliser Association of New Zealand	Amend Rule 5.51A from a non-complying activity to a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1991	Ravensdown Limited	Amend Rule 5.51A from a non-complying activity to discretionary activity.		
PC5LWRP-337	DairyNZ	Amend Rule 5.51A to include the matters covered under proposed Rule 5.52A. The Rule is otherwise adopted as proposed, given the relief sought in respect to Rule 5.50A.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-231	Dairy Holdings Limited	Amend Rule 5.51A as follows: Within the Lake Zone, the use of land for a farming activity on a property greater than 10 hectares that does not comply with condition 1 or 2 of Rule 5.50A is non-complying activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.52A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1832	Forest and Bird NZ	Retain Rule 5.52A as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-703	North Canterbury Fish and Game & SI Fish and Game	Retain Rule 5.52A as notified. AND further or alternative relief to the effect of that sought.		
PC5LWRP-233	Dairy Holdings Limited	Delete Rule 5.52A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2157	Irrigation New Zealand Inc	Delete Rule 5.52A.		
PC5LWRP-295	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.52A.		
PC5LWRP-2314	Federated Farmers of New Zealand	Delete Rule 5.52A and treat Lake Zones similarly to Red Zones.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1395	Beef and Lamb New Zealand Ltd	Delete Rule 5.52A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-338	DairyNZ	Delete Rule 5.52A and farming activities that do not meet condition 2 of Rule 5.50A are a non-	Reject	The amendments requested would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		complying activity under Rule 5.51A.		provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-567	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.52A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1998	Ravensdown Limited	Amend Rule 5.52A to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-437	Ballance Agri-Nutrients Limited	Amend Rule 5.52A to include a non-complying activity status and any consequential amendments.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1519	Fertiliser Association of New Zealand	Amend Rule 5.52A from a prohibited activity to a discretionary activity. OR combine with Rule 5.51A as a discretionary activity.		
PC5LWRP-1998A	Ravensdown Limited	Amend Rule 5.52A from a prohibited activity to a non-complying activity.		

Rule 5.53A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-887	Opuha Water Limited	Retain Rule 5.53A as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-2000	Ravensdown Limited	Retain the permitted activity status of Rule 5.53A.	Accept	We agree that retaining a permitted activity classification in this rule is appropriate.
PC5LWRP-2158	Irrigation New Zealand Inc	Delete Rule 5.53A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-296	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.53A.		
PC5LWRP-2523	Anderson D & K and Anderson B & M	Delete Rule 5.53A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.		
PC5LWRP-2655	Holland D G	Delete Rule 5.53A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.		
PC5LWRP-1396	Beef and Lamb New Zealand Ltd	Delete Rule 5.53A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1833	Forest and Bird NZ	Delete and replace Rule 5.53A with a rule that provides that activities covered by the rule cannot increase nutrient losses, similar to existing Rule 5.53.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				economic growth and employment.
PC5LWRP-2243	Hoban J K W	Delete Rule 5.53A and replace with rules that mean: • Farmers are required to use OVERSEER® to model nutrient losses if they have: • More than 50 hectares and 10% of property/farming entity irrigated • More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle • If a nutrient budget is required and produced an estimate of less than 20kg/n/ha in an Orange then it is a permitted activity- and any consequential amendments.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-572	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.53A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2000A	Ravensdown Limited	Amend Rule 5.53A as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity on a property greater than 10 hectares in area is a permitted activity subject to complying with Good Management Practices. Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2315	Federated Farmers of New Zealand	Amend Rule 5.53A as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity, provided Industry Good Management Practices are applied.		
PC5LWRP-1520	Fertiliser Association of New Zealand	Amend Rule 5.53A as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good Management Practices.		
PC5LWRP-846	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.53A as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity provided that the property is not used for intensive winter grazing.	Reject	We consider the conditions of this rule are sufficient to restrict the intensity of an activity that may occur on the property.
PC5LWRP-339	DairyNZ	Amend Rule 5.53A as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity, with the expectation that land users will operate at Industry Agreed Good Management Practices. Or words to similar effect.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Rule 5.54A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-306	DairyNZ	Retain Rule 5.54A as notified.	Accept	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1335	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.54A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				instruments. See Chapter 6 of this report.
PC5LWRP-1834	Forest and Bird NZ	Delete Rule 5.54A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2159	Irrigation New Zealand Inc	Delete Rule 5.54A.		
PC5LWRP-297	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.54A.		
PC5LWRP-126	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2530	Anderson D & K and Anderson B & M	Delete Rule 5.54A and adopt a catchment board model and any consequential amendments.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2508	Holland D G	Delete Rule 5.54A and adopt a catchment board model and any consequential amendments.		
PC5LWRP-1398	Beef and Lamb New Zealand Ltd	Delete Rule 5.54A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2251	Hoban J K W	Delete Rule 5.54A and replace with rules that mean: • Farmers are required to use OVERSEER® to model nutrient losses if they have: • More than 50 hectares and 10% of property/farming entity irrigated • More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle • If a nutrient budget is required and produced an estimate of less than 20kg/n/ha in an Orange then it is a permitted activity.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2003	Ravensdown Limited	Amend Rule 5.54A to: 1. Require a nutrient budget to be updated after three years, unless there is a significant farm system change; 2. Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; 3. Provide an additional formal process for reviewing and moderating inaccurate portal results; 4. Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; 5. Address the concerns raised regarding the definition of 'winter grazing'.	Accept in part	In respect of the relief sought in (1), (2), (3) and (5), we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions. See Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-569	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.54A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1664	Horticulture New Zealand	Amend Rule 5.54A to include "or farming enterprise" after 'property'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1314	Chisnall W G S	Amend Rule 5.54A to exclude coastal areas from the requirement to have a Management Plan.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1442	Mackenzie Irrigation	Amend Rule 5.54A to exclude the use of narratives and instead use a percentage of the total	Accept in part	In response to this and other submissions we recommend an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Company Ltd	farm area.		amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1522	Fertiliser Association of New Zealand	Amend Rule 5.54A(1) as follows: The property is registered in the Farm Portal by 1 July 20 ~~17~~ 18 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a significant farm system change;	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2003A	Ravensdown Limited	Amend Rule 5.54A(1) as follows: The property is registered in the Farm Portal by 1 July ~~2017~~ 2018 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a material farm system change ; and… Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-468	Ballance Agri-Nutrients Limited	Amend Rule 5.54A(1) as follows: ...and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24 months~~36 months thereafter, unless there is a material change to the farm system ; and		
PC5LWRP-198	Dairy Holdings Limited	Amend Rule 5.54A(1) to refer to "1 July 201~~7~~8 "		
PC5LWRP-945	Sparrow M	Amend Rule 5.54A(1) to include the following: or, is registered in the Farm Portal after (the respective dates) within 6 months of any change in landownership or management which results in the creation of a new qualifying property OR add statements to similar effect.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1398A	Beef and Lamb New Zealand Ltd	Amend Rule 5.54A(2) as follows if the relief sought in PC5LWRP-1398 is not accepted: 2. The area of the property authorised to be irrigated with water is less than 50 hectares and 10 percent of the property ; and	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-704	North Canterbury Fish and Game & SI Fish and Game	Amend Rule 5.54A(2) to insert a new Clause 2(a) as follows: 2(a) For any property where, as at 13 February 2016, the area of land authorised to be irrigated with water is less than 50 hectares, any increase in the area of irrigated land is limited to 10 hectares above that which was irrigated at 13 February 2016;		
PC5LWRP-358A	Moir Farms Maimai Limited	Delete Rule 5.54A(3) and replace with a percentage of farms that can have winter crops grazed	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1398B	Beef and Lamb New Zealand Ltd	Amend Rule 5.54A(3) as follows if the relief sought in PC5LWRP-1398 is not accepted: 3. The area of any property used for winter grazing within the period 1 May to 1 September does not exceed a total of ~~20~~50 hectares and 10% of the property ; and…		
PC5LWRP-2508A	Holland D G	Amend Rule 5.54A(3) to achieve voluntary farm plans and GMP related [rather than threshold] winter grazing rules.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-465	Bellfield Land Co Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1140	Haldon Station Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-959	Killermont Station 2012 Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1119	Twinburn Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-2639	Craigmore Farming	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-2630	Kakahu Catchment Group	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-830	Waitaki Irrigators Collective Ltd	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing. Submitter seeks new rule framework in Part B - Section 15B [refer to PC5LWRP-790] and requests that region-wide rules be amended to this effect.		
PC5LWRP-1285	Stackhouse Farm	Amend Rule 5.54A to set thresholds of 100 ha for irrigated land and 100 ha for winter grazing.		
PC5LWRP-847	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.54A to achieve a revision of the 20ha permitted baseline for winter grazing to manage the effects on the receiving environment.		
PC5LWRP-709	Johnston R H M	Amend Rule 5.54A(3) to delete 20 ha value and amend to take into consideration the size of the property.		
PC5LWRP-1228	Claremont Farms Ltd	Amend Rule 5.54A (3) so that the area of permitted green feed cultivation is commensurate with the overall farmed land area or there should be a maximum permitted fertiliser application per hectare .	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-704A	North Canterbury Fish and Game & SI Fish and Game	Amend Rule 5.54A(3) as follows: The area of property used for winter grazing is less than 20 hectares , any increase in the area of winter grazing is limited to 10 hectares above that which was winter grazed at 13 February 2016 ; AND further or alternative relief to the effect of that sought.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-420	Forrester M and G	Delete 5.54A(3) and replace the 20 hectares with a percentage of the total farmed area, e.g. 10% for winter crops.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1450	Hurunui SNA Group & Rural Advocacy	Amend Rule 5.54A (3) to exclude the reference to 20 hectares, and manage intensive grazing cattle either by: 1) the use of voluntary farm plans and education; OR 2) permit winter grazing so long as it meets practical farmer agreed GMPs.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-419	Forrester M and G	Amend Rule 5.54A(3) to replace the 20 hectares with a percentage of the total farmed area, e.g. 10% for winter crops.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2432	Federated Farmers of New Zealand	Delete Rule 5.54A(4) and replace with the follows: All farming activities to achieve Industry GMP by 30 June 2020.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-847B	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.54A to include an additional condition as follows: The nitrogen loss calculation for the property does not exceed 15kgs per hectare annum.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.

Rule 5.54B

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2005	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved retain the controlled activity status of Rule 5.54B.	Accept	We agree that retaining a controlled activity classification in this rule is appropriate.
PC5LWRP-1337	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.54B, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1835	Forest and Bird NZ	Delete Rule 5.54B.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2160	Irrigation New Zealand Inc	Delete Rule 5.54B.		
PC5LWRP-298	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.54B.		
PC5LWRP-1401	Beef and Lamb New Zealand Ltd	Delete Rule 5.54B and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1667	Horticulture New Zealand	Amend Rule 5.54B to include "or farming enterprise" after 'property'.	Reject	Plan Change 5 already includes provisions to manage farming enterprises.
PC5LWRP-2648	Dave Ashby Rural Consultants Limited	Amend Rule 5.54B to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-575	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.54B to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-156	Barton N	Amend Rule 5.54B to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1527	Fertiliser Association of New Zealand	Amend Rule 5.54B(2) to provide for farm systems which cannot use the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2005A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.54B(2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-235	Dairy Holdings Limited	Amend 5.54B(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Orange Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline ; or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss Rate; and…	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1080	Amuri Irrigation Co Limited	Amend Rule 5.54B(2) as follows: Delete the references in Condition (2) to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.	Reject	We adopt the recommendations and reasons set out in the section 42A Report.
PC5LWRP-340	DairyNZ	Amend Rule 5.54B(2) as follows: 2. ~~Until 30 June 2020, t~~The nitrogen loss calculation for the part of the property within the Orange Nutrient Allocation Zone does not exceed the ~~nitrogen baseline, and from 1 July 2020 the~~ Baseline GMP Loss Rate or Loss Rate assessed as Baseline GMP from 1 July 2020 ; and	Accept in part	This submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-729	Rangitata Diversion Race Management Limited	Amend Rule 5.54B (2) and delete references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm;	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-850	Opuha Water Limited	Amend Rule 5.54B(3) by either: Moving condition 5.54B(3) into one of the matters over which the CRC reserves control for the rule. OR Adding the words ...or suitably experienced person at the end of condition 3; OR words to similar effect and make any consequential amendments.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. Provisions in Plan Change 5 relating to the qualifications required to prepare a nutrient budget already address these matters.
PC5LWRP-2433	Federated Farmers of New Zealand	Delete Rule 5.54B(3).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-340A	DairyNZ	Delete Rule 5.54B(3).		
PC5LWRP-1667A	Horticulture New Zealand	Delete Rule 5.54B(3).		
PC5LWRP-729A	Rangitata Diversion	Amend Rule 5.54B matter of control (4) to read:	Reject	The timeframe for compliance with the Baseline GMP Loss Rate

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Race Management Limited	(4) Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and		is a condition of entry to the rule. Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-1080A	Amuri Irrigation Co Limited	Amend Rule 5.54B matters of control (4) to read: (4) Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and		
PC5LWRP-729B	Rangitata Diversion Race Management Limited	Amend Rule 5.54B matter of control (5) to read: (5) Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …";		
PC5LWRP-1080B	Amuri Irrigation Co Limited	Amend Rule 5.54B matters of control (5) to read: (5) Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …;"		
PC5LWRP-1252	Canterbury District Health Board	Amend Rule 5.54B, Matters for Control (6) to specify at what level mitigation measures should be implemented. Trigger levels should be set at a point that limit adverse effects on drinking water before they impact on public health.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-729C	Rangitata Diversion Race Management Limited	Delete Rule 5.54B matter of control (9) AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	We recommend an amendment to clarify the circumstances in which this matter of discretion may be exercised.
PC5LWRP-1080C	Amuri Irrigation Co Limited	Delete Rule 5.54B matter of control (9).		
PC5LWRP-1667B	Horticulture New Zealand	Amend Rule 5.54B by inserting a new matter of control. The preparation and review of the Farm Environment Plan.	Reject	Condition 1 of this rule addresses this matter.
PC5LWRP-2433A	Federated Farmers of New Zealand	Amend Rule 5.54B to include a matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	Matters of control (1) and (3) already address this matter.
PC5LWRP-340B	DairyNZ	Amend Rule 5.54B by inserting an additional matter of control: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	Condition 1 of this rule addresses this matter.

Rule 5.55A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1836	Forest and Bird NZ	Retain Rule 5.55A as notified.	Accept	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2006	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-PC5LWRP-2719 and PC5LWRP-2715 are resolved retain the restricted [discretionary] activity status of Rule 5.55A.	Accept in part	We agree that retaining the restricted discretionary classification in this rule is appropriate.
PC5LWRP-1338	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.55A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				instruments. See Chapter 6 of this report.
PC5LWRP-2161	Irrigation New Zealand Inc	Delete Rule 5.55A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-299	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.55A.		
PC5LWRP-1407	Beef and Lamb New Zealand Ltd	Delete Rule 5.55A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1836A	Forest and Bird NZ	Amend Rule 5.55A to refer to Rule 5.53 not 5.54B.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1061	Dave Ashby Rural Consultants Limited	Amend Rule 5.55A to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-577	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.55A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1672	Horticulture New Zealand	Amend Rule 5.55A to include "or farming enterprise" after 'property'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-157	Barton N	Amend Rule 5.55A to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-128	Hunter Downs Development Company Limited	Amend Rule 5.55A as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity on a property greater than 10 hectares in area, that results in a nitrogen loss rate that is greater than the nitrogen baseline and which does not comply with condition 2 or 3 of Rule 5.54B, is a ~~restricted~~ discretionary activity provided the following conditions are met:	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-880	Opuha Water Limited	Retain Rule 5.55A(2) as notified.	Accept	We agree that retaining condition 2 of this rule as notified is appropriate.
PC5LWRP-1529	Fertiliser Association of New Zealand	Amend Rule 5.55A(2) to provide for farm systems which cannot use the Farm Portal. Under matters for discretion include provision to consider demonstration of meeting Good Management Practice.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2006A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend 5.55A(2) to: • Provide an alternative pathway in addition to that provided by the portal, and for	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-128A	Hunter Downs Development Company Limited	Amend Rule 5.55A(2) as follows: 2. Any increase in the nitrogen loss rate occurs in circumstances where the anticipated environmental outcomes for the Orange Nutrient Allocation Zone continue to be met; and	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-741	Fonterra Co-operative Group Ltd	Amend Rule 5.55A(2) as follows: Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Orange Nutrient Allocation Zone does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the greater of Baseline GMP Loss Rate and 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.	Reject	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-236	Dairy Holdings Limited	Amend 5.55A(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Orange Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline ; or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss Rate....	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1159	Amuri Irrigation Co Limited	Amend Rule 5.55A(2) as follows: Delete the references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm;	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-731	Rangitata Diversion Race Management Limited	Amend Rule 5.55A(2) to delete references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.		
PC5LWRP-342	DairyNZ	Amend Rule 5.55A(2) as follows: 2. ~~Until 30 June 2020, t~~The nitrogen loss calculation for the part of the property within the Orange Nutrient Allocation Zone does not exceed the ~~nitrogen baseline, and from 1 July 2020 the~~ Baseline GMP Loss Rate or the Loss Rate assessed as Baseline GMP from 1 July 2020, unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful. Or words to similar effect.	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-128B	Hunter Downs Development Company Limited	Amend Rule 5.55A(2) as follows: ~~Until 30 June 2020, t~~The nitrogen loss calculation for the part of the property within the Orange Nutrient Allocation Zone does not, from 1 July 2020, exceed the Good Management Practice Loss Rate (based on the land use following intensification)~~the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate, unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful~~ .	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1159A	Amuri Irrigation Co Limited	Amend Rule 5.55A as follows: Amend to include a new Condition (3) that enables consideration of farm activities that cannot be accurately modelled by the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-731A	Rangitata Diversion Race Management Limited	Amend Rule 5.55A by adding a new Clause that enables consideration of farm activities that cannot be accurately modelled by the Farm Portal.		limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-342A	DairyNZ	Amend Rule 5.55A matters of discretion to achieve inclusion of an alternative consenting pathway developed in addition to the requirement to not exceed the Baseline GMP Loss Rate under Rule 5.55A; AND/OR 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; AND/OR remove specific reference to the Baseline GMP Loss Rate and Good Management Practice Loss Rate in matters (5) and (6), and replace with a requirement that the consent applicant will demonstrate how the land use will meet the Industry GMP Practices. Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In respect of the rest of the relief sought we are not persuaded that the amendments requested would be more effective and reasonably practicable options for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1269	Canterbury District Health Board	Amend Rule 5.55A matter of discretion (3) to read: "The actual or potential adverse effects of the activity on surface and groundwater quality and sources of drinking water and how these will be avoided and mitigated"	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1159B	Amuri Irrigation Co Limited	Amend Rule 5.55A matter of discretion (5) to read: Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and	Accept in part	The timeframe for compliance with the Baseline GMP Loss Rate is a condition of entry to the rule. Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-731B	Rangitata Diversion Race Management Limited	Amend Rule 5.55A matter of discretion (5) to read: Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and		
PC5LWRP-1159C	Amuri Irrigation Co Limited	Amend Rule 5.55A matter of discretion (6) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …"		
PC5LWRP-731C	Rangitata Diversion Race Management Limited	Amend Rule 5.55A matter of discretion (6) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …";		
PC5LWRP-1159D	Amuri Irrigation Co Limited	Delete Rule 5.55A matter of discretion (10).	Reject	We recommend an amendment to clarify the circumstances in which this matter of discretion may be exercised.
PC5LWRP-731D	Rangitata Diversion Race Management Limited	Delete Rule 5.55A matter of discretion (10).		
PC5LWRP-2006B	Ravensdown Limited	Amend Rule 5.55A by inserting a new matter of discretion to consider demonstration of meeting Good Management Practice.	Reject	Matters of discretion (1) and (4) already allows for consideration of this matter.
PC5LWRP-741A	Fonterra Co-operative Group Ltd	Amend Rule 5.55A by inserting a new matter of discretion The determination of the Loss Rate Assessed as Baseline GMP.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				accordingly. See also Chapter 9 of this report.
PC5LWRP-858	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.55A to include an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 4.37(b);	Reject	Matters of discretion (5) and (6) already address these matters.
PC5LWRP-128C	Hunter Downs Development Company Limited	Amend Rule 5.55A by deleting the matters of discretion.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1269A	Canterbury District Health Board	Amend Rule 5.55A by inserting a [new] section to explain at what level mitigation measures should be implemented.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.56AA

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1837	Forest and Bird NZ	Retain Rule 5.56AA as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-2009	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the discretionary activity status of Rule 5.56AA.	Accept	We agree that retaining the restricted discretionary activity classification in this rule is appropriate.
PC5LWRP-130	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1339	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.56AA, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1680	Horticulture New Zealand	Delete Rule 5.56AA.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2162	Irrigation New Zealand Inc	Delete Rule 5.56AA.		
PC5LWRP-1412	Beef and Lamb New Zealand Ltd	Delete Rule 5.56AA and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-300	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.56AA.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-579	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.56AA to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				the superior instruments.
PC5LWRP-1837A	Forest and Bird NZ	Amend Rule 5.56AA to be consistent with relief sought on Policy 4.38C [PC5LWRP-1806].	Reject	The requested amendment is uncertain and would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1067	Dave Ashby Rural Consultants Limited	Amend Rule 5.56AA to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-158	Barton N	Amend Rule 5.56AA to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-341	DairyNZ	Amend Rule 5.56AA as follows: Within the Orange Nutrient Allocation Zone, the use of land for a farming activity as part of a farming enterprise is a restricted discretionary activity, provided the following conditions are met:	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-38	Barton N	Amend Rule 5.56AA to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1082	Fonterra Co-operative Group Ltd	Amend Rule 5.56AA 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate not exceeding the Baseline GMP Loss Rate; and 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 7. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 8. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 9. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 10. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-742	Fonterra Co-operative	Amend Rule 5.56AA (2) as follows:	Accept in part	These submissions request provision in Plan Change 5 for an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Group Ltd	Until 30 June 2020, the nitrogen loss calculation [*for the farming enterprise*] does not exceed the nitrogen baseline, and from 1 July 2020 does not exceed the greater of the Good Management Practice Loss Rate and the Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1530	Fertiliser Association of New Zealand	Amend Rule 5.56AA(2) to provide for farm systems which cannot use the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-875	Opuha Water Limited	Amend Rule 5.56AA(2) as follows: Until 30 June 2020 the nitrogen loss calculation for the farming enterprise does not exceed the nitrogen baseline unless the nitrogen baseline has been lawfully exceeded prior to 13 February 2016; and, from 1 July 2020 the Good Management Practice loss rate; and... Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-341A	DairyNZ	Amend Rule 5.56AA (2) as follows: ~~Until 30 June 2020, t~~The nitrogen loss calculation for the farming enterprise does not exceed the ~~nitrogen baseline, and from 1 July 2020 the~~ Baseline GMP Loss Rate from 1 July 2020; and…	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-238	Dairy Holdings Limited	Amend 5.56AA(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Orange Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline ; or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss Rate, and....	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2009A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.56AA (2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-341B	DairyNZ	Amend Rule 5.56AA by inserting matters of discretion outlined in submission point PC5LWRP-342A (Rule 5.55A).	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.56A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2164	Irrigation New Zealand Inc	Delete Rule 5.56A.	Accept	We agree that omitting this rule is appropriate.
PC5LWRP-580	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.56A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.56AB

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-343	DairyNZ	Retain Rule 5.56AB as notified provided the relief sought in PC5LWRP-340 (Rule 5.54B), PC5LWRP-342 (Rule 5.55A) and PC5LWRP-341 (Rule 5.56AA) is adopted.	Accept in part	We agree that retaining the rule is appropriate.
PC5LWRP-131	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2165	Irrigation New Zealand Inc	Delete Rule 5.56AB.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1415	Beef and Lamb New Zealand Ltd	Delete Rule 5.56AB and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-581	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.56AB to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-159	Barton N	Amend Rule 5.56AB to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.		
PC5LWRP-1838	Forest and Bird NZ	Amend Rule 5.56AB so that activities that exceed their GMP baseline are prohibited.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-2010	Ravensdown Limited	Amend Rule 5.56AB from a non-complying activity to a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1531	Fertiliser Association of New Zealand	Amend Rule 5.56AB from a non complying activity to a discretionary activity.		

Rule 5.57

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1839	Forest and Bird NZ	Oppose deletion of Rule 5.57.	Reject	We consider the nutrient managememtn framework proposed by Plan Change 5 is a more effective method for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.57A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-889	Opuha Water Limited	Retain Rule 5.57A as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-315	Ellesmere Sustainable Agriculture Inc	Retain Rule 5.57A, provided it has precedence over Rule 5.41A.	Accept in part	We agree that retaining the rule is appropriate but we are not persuaded of the precedence request.
PC5LWRP-2012	Ravensdown Limited	Retain permitted activity status of Rule 5.57A;	Accept	We agree that retaining the permitted activity classification in this rule is appropriate.
PC5LWRP-1480	Hurunui SNA Group & Rural Advocacy	Delete Rule 5.57A, and replace with policies and methods that encourage all property owners, regardless of property size, to be responsible landowners.	Reject	Provisions in Plan Change 5 and the LWRP already address these matters
PC5LWRP-1840	Forest and Bird NZ	Delete Rule 5.57A and revert to existing Rule 5.57 [PC5LWRP1839]	Reject	We consider the nutrient management framework proposed by Plan Change 5 is a more effective method for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2503	Holland D G	Delete Rule 5.57A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.	Reject	Provisions in Plan Change 5 and the LWRP already address these matters
PC5LWRP-2524	Anderson D & K and Anderson B & M	Delete Rule 5.57A and replace with policies and plan provisions that encourage all properties regardless of size to be responsible land owners.		
PC5LWRP-1416	Beef and Lamb New Zealand Ltd	Delete Rule 5.57A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-2245	Hoban J K W	Delete Rule 5.57A and replace with rules that mean: • Farmers are required to use OVERSEER® to model nutrient losses if they have: • More than 50 hectares and 10% of property/farming entity irrigated • More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle • If a nutrient budget is required and produced an estimate of less than 20kg/n/ha in a Light Blue then it is a permitted activity- and any consequential amendments.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-584	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.57A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2012A	Ravensdown Limited	Amend Rule 5.57A as follows: Within the Green or Light Blue Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Further we consider the requirement for farming activities to implement a management plan in

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Management Practices. Or such other or alternative wording which would properly address the concerns raised.		accordance with Schedule 7A appropriately addresses this point.
PC5LWRP-1570	Fertiliser Association of New Zealand	Amend Rule 5.57A as follows: Within the Green or Light Blue Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity subject to complying with Good Management Practices.		
PC5LWRP-344	DairyNZ	Amend Rule 5.57A as follows: Within the Green or Light Blue Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity , with the expectation that land users will operate at Industry Agreed Good Management Practices . Or words to similar effect.		
PC5LWRP-859	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.57A as follows: Within the Green or Light Blue Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity provided that the property is not used for intensive winter grazing.	Reject	We consider the conditions of this rule are sufficient to restrict the intensity of an activity that may occur on the property.
PC5LWRP-2474	Irrigation New Zealand Inc	Amend Rule 5.57A as follows: Within the Green or Light Blue zones the…are a permitted activity provided the following conditions are met: 1. The property has adopted the relevant industry Good Management Practices	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Further we consider the requirement for farming activities to implement a management plan in accordance with Schedule 7A appropriately addresses this point.
PC5LWRP-946	Sparrow M	Amend Rule 5.57A to include the following: or, is registered in the Farm Portal after (the respective dates) within 6 months of any change in landownership or management which results in the creation of a new qualifying property. Or add statements to similar effect.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2318	Federated Farmers of New Zealand	Amend Rule 5.47A as follows: Within the Green or Light Blue Nutrient Allocation Zone, the use of land for a farming activity on a property 10 hectares or less in area is a permitted activity, provided Industry Good Management Practices are applied.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Rule 5.57B

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-307	DairyNZ	Retain Rule 5.57B as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1841	Forest and Bird NZ	Delete Rule 5.57B.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-132	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1341	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.57B, and replace with a catchment board type model similar to Taranaki. Also address	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		the issue of misuse of private property information.		objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1482	Hurunui SNA Group & Rural Advocacy	Delete Rule 5.57B, and replace with policies and methods to encourage Council to work with farmers in a voluntary capacity to ensure good land use practices.		
PC5LWRP-317	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.57B.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1417	Beef and Lamb New Zealand Ltd	Delete Rule 5.57B and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits. In the event that this approach is not adopted.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-473	Ballance Agri-Nutrients Limited	Amend Rule 5.57B(1) as follows: ...and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24 months~~36 months thereafter, unless there is a material change to the farm system ; and	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2253	Hoban J K W	Delete Rule 5.57B and replace with rules that mean: • Farmers are required to use OVERSEER® to model nutrient losses if they have: • More than 50 hectares and 10% of property/farming entity irrigated • More than 30 hectares and 10% of property/farming entity planed in fodder crop intended for winter grazing of cattle • If a nutrient budget is required and produced an estimate of less than 20kg/n/ha in a Light Blue then it is a permitted activity	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2531	Anderson D & K and Anderson B & M	Delete Rule 5.57B and adopt a catchment board model.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2509	Holland D G	Amend Rule 5.57B to achieve voluntary farm plans and GMP related [rather than threshold] winter grazing rules.		
PC5LWRP-585	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.57B to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2015	Ravensdown Limited	Amend Rule 5.57B to: 1. Require a nutrient budget to be updated after three years, unless there is a significant farm system change; 2. Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; 3. Provide an additional formal process for reviewing and moderating inaccurate portal results; 4. Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; 5. Address the concerns raised regarding the definition of winter grazing;	Accept in part	In respect of (1), (2), (3) and (5), we recommend amendments to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions. See Chapter 14 of this report with respect to the request to embed the GMP loss rate within the FEP process.
PC5LWRP-2509A	Holland D G	Amend Rule 5.57B to adopt a catchment board model.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-160	Barton N	Amend Rule 5.57B to include intensification up to a good management practice loss rate for the	Reject	We are not persuaded that the amendment requested would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		land use authorised by a water permit granted prior to 13 February 2016.		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1286	Stackhouse Farm	Amend Rule 5.57B to set thresholds of 100 ha for irrigated land and 100 ha for winter grazing.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-860	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 5.57B to include an additional condition as follows: The nitrogen loss calculation for the property does not exceed 15kgs per hectare annum: and AND Amend Rule 5.57B to achieve a revision of the 20ha permitted baseline for winter grazing to manage the effects on the receiving environment.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.
PC5LWRP-1673	Horticulture New Zealand	Amend Rule 5.57B to include " or farming enterprise" after 'property'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2263	Nutrient Solutions Ltd	Amend Rule 5.57B to explain what 20 ha of winter grazing means in respect of crop type and farming systems and consider replacing the prescribed area with a % value for larger farms and development of a different approach for smaller farms. Submitter suggests 10% and/or maximum number of cattle for any property > 50ha. AND Amend Rule 5.57B to exclude perennial crops from any conditions involving irrigated area.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions. In respect of the request to exclude perennial crops, the amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1443	Mackenzie Irrigation Company Ltd	Amend Rule 5.57B to exclude the use of narratives and instead use a percentage of the total farm area.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1315	Chisnall W G S	Amend Rule 5.57B to exclude coastal areas from the requirement to have a Management Plan.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1461	Hodder W D	Amend Rule 5.57B to ensure the winter grazing threshold that takes into account crop yield and grazing management system.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1572	Fertiliser Association of New Zealand	Amend Rule 5.57B(1) as follows: The property is registered in the Farm Portal by 1 January 20~~18~~19 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a significant farm system change ; and…	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2015A	Ravensdown Limited	Amend Rule 5.57B(1) as follows: The property is registered in the Farm Portal by 1 July ~~2017~~2018 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a material farm system change ; and .. Or such other or alternative wording which would properly address the concerns raised.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2477	Irrigation New Zealand Inc	Amend Rule 5.57B(1) as follows: Within the Green or Light Blue zones… 1. … every 60 months thereafter 6. The property has adopted the relevant industry Good Management Practices	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Further we consider the requirement for farming activities to implement a management plan in accordance with Schedule 7A appropriately addresses this point.
PC5LWRP-2509B	Holland D G	Delete Rule 5.57B(1) as an appropriate condition for a permitted activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 9 of this report.
PC5LWRP-359	Moir Farms Maimai Limited	Delete Rule 5.57B(2) and replace with a percentage of farms with irrigation rather than 50 hectare value.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1417A	Beef and Lamb New Zealand Ltd	Amend Rule 5.57B(2) as follows: 2. The area of the property authorised to be irrigated with water is less than 50 hectares and 10 percent of the property ; and		
PC5LWRP-1229	Claremont Farms Ltd	Amend Rule 5.57B (3) so that the area of permitted green feed cultivation is commensurate with the overall farmed land area or there should be a maximum permitted fertiliser application per hectare.		
PC5LWRP-1417B	Beef and Lamb New Zealand Ltd	Amend Rule 5.57B(3) as follows: 3. The area of any property used for winter grazing within the period 1 May to 1 September does not exceed a total of ~~20~~50 hectares and 10% of the property ; and…	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1452	Hurunui SNA Group & Rural Advocacy	Amend Rule 5.57B (3) to exclude the reference to 20 hectares, and manage intensive grazing cattle either by: 1) the use of voluntary farm plans and education; OR 2) permit winter grazing so long as it meets practical farmer agreed GMPs.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-421	Forrester M and G	Amend Rule 5.57B(3) by deleting the reference to 20 hectares, and replacing with a percentage of the total farmed area, e.g. 10% for winter crops.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1087	Giles M	Delete Rule 5.57B(3) and replace with assessment based on Good Management Practice and the Farm Portal.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-359A	Moir Farms Maimai Limited	Delete Rule 5.57B(3) and replace with a percentage of farms that can have winter crops grazed.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2477A	Irrigation New Zealand Inc	Delete 5.57B(3).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-831	Waitaki Irrigators Collective Ltd	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing. Submitter seeks new rule framework in Part B - Section 15B [refer to PC5LWRP-790] and requests that region-wide rules be amended to this effect.	Accept in part	In response to this and other submissions we recommend an amendment to the thresholds relating to winter grazing, for the reasons in the original submission or advanced in the evidence

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2631	Kakahu Catchment Group	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		and legal submissions in support of original submissions.
PC5LWRP-2640	Craigmore Farming	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-62	Bellfield Land Co Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-960	Killermont Station 2012 Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1001	Rietveld J A	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1120	Twinburn Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1141	Haldon Station Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-2436	Federated Farmers of New Zealand	Amend Rule 5.57B(4) as follows: 4. All farming activities to achieve Industry GMP by 30 June 2020.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2477B	Irrigation New Zealand Inc	Delete 5.57B(5).	Reject	There is no condition 5 in this rule.

Rule 5.57C

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2022	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the controlled activity status of Rule 5.57C;	Accept	We agree that retaining a controlled activity status is appropriate.
PC5LWRP-133	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1344	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.57C, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-319	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.57C.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1485	Hurunui SNA Group & Rural Advocacy	Delete Rule 5.57C.		
PC5LWRP-1842	Forest and Bird NZ	Delete Rule 5.57C.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1418	Beef and Lamb New Zealand Ltd	Delete Rule 5.57C and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-345	DairyNZ	Delete Rule 5.57C and substitute the following: Within the Green or Light Blue 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 one or more of the conditions of Rule 5.57B is a ~~controlled~~permitted activity provided the following conditions are met: 1. The property is registered in the Farm Portal by 1 January 2018. 2. The Nitrogen Loss Calculation for the part of the property within the Green or Light Blue Nutrient Allocation Zone does not exceed the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP from 1 July2020.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1070	Dave Ashby Rural Consultants Limited	Amend Rule 5.57C to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-586	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.57C to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-161	Barton N	Amend Rule 5.57C to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1674	Horticulture New Zealand	Amend Rule 5.57C to include " or farming enterprise" after 'property'.	Reject	Provisions in Plan Change 5 already regulate nutrient losses from farming enterprises and therefore the requested amendment is unnecessary.
PC5LWRP-2478	Irrigation New Zealand Inc	Amend Rule 5.57C as follows: Within the Red, Lake and Orange zones…		
PC5LWRP-1168	Amuri Irrigation Co Limited	Amend Rule 5.57C(2) as follows: Delete the references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1576	Fertiliser Association of New Zealand	Amend Rule 5.57C(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2022A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.57C(2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		granting a consent; Or such other or alternative wording which would properly address the concerns raised.		embed the GMP loss rate within the FEP process.
PC5LWRP-736	Rangitata Diversion Race Management Limited	Amend Rule 5.57C (2) to delete references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-240	Dairy Holdings Limited	Amend 5.57C(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Green or Light Blue Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline ; or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss Rate, and....	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-851	Opuha Water Limited	Amend Rule 5.57C(3) by either: Moving condition 5.57C (3) into one of the matters over which the CRC reserves control for the rule. OR Adding the words ...or suitably experienced person at the end of condition 3. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. Provisions in Plan Change 5 relating to the qualifications required to prepare a nutrient budget already address these matters.
PC5LWRP-2478A	Irrigation New Zealand Inc	Delete 5.57C(3).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2437	Federated Farmers	Delete 5.57C(3).		
PC5LWRP-2437A	Federated Farmers	Amend Rule 5.57C to add an additional matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget	Reject	Condition 1 and matter of control (2) already address these matters.
PC5LWRP-1168A	Amuri Irrigation Co Limited	Amend Rule 5.57C matter of control (4) to read: (4) Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and	Reject	The timeframe for compliance with the Baseline GMP Loss Rate is a condition of entry to the rule. Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-736A	Rangitata Diversion Race Management Limited	Amend Rule 5.57C matter of control (4) to read: (4) Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and		
PC5LWRP-1168B	Amuri Irrigation Co Limited	Amend Rule 5.57C matter of control (5) to read: (5) Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …"		
PC5LWRP-736B	Rangitata Diversion Race Management Limited	Amend Rule 5.57C matter of control (5) to read: (5) Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate		
PC5LWRP-1254	Canterbury District Health Board	Amend Rule 5.57C matter of control (6) to specify at what level mitigation measures should be implemented. Trigger levels should be set at a point that limit adverse effects on drinking water before they impact on public health.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1168C	Amuri Irrigation Co Limited	Delete Rule 5.57C matter of control (9).	Reject	We recommend an amendment to clarify the circumstances in which this matter of discretion may be exercised.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-736C	Rangitata Diversion Race Management Limited	Delete Rule 5.57C matter of control (9).		
PC5LWRP-2478B	Irrigation New Zealand Inc	Amend 5.57C to include a new matter of control: 10. The quality of the Farm Environment Plan, including whether it has been prepared or reviewed by an Accredited Farm Consultant	Reject	Condition 3 already addresses this matter.

Rule 5.58A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1843	Forest and Bird NZ	Retain Rule 5.58A.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2025	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the restricted [discretionary] activity status of Rule 5.58A as notified.	Accept	We agree that retaining a restricted discretionary activity classification is appropriate.
PC5LWRP-1346	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.58A, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See also Chapter 6 of this report.
PC5LWRP-1486	Hurunui SNA Group & Rural Advocacy	Delete Rule 5.58A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-321	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.58A.		
PC5LWRP-1419	Beef and Lamb New Zealand Ltd	Delete Rule 5.58A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-162	Barton N	Amend Rule 5.58A to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1072	Dave Ashby Rural Consultants Limited	Amend Rule 5.58A to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-588	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.58A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-134	Hunter Downs Development Company Limited	Amend Rule 5.58A as follows: Within the Green or Light Blue Nutrient Allocation Zone the use of land for a farming activity on a property greater than 10 hectares in area, that results in a nitrogen loss rate that is greater than 5kg/ha/yr above the nitrogen baseline and which does not comply with condition 2 or 3 of	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. =

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Rule 5.57C, is a restricted discretionary activity provided the following conditions are met:		
PC5LWRP-1676	Horticulture New Zealand	Amend Rule 5.58A to include "or farming enterprise" after 'property'.	Reject	Provisions in Plan Change 5 already regulate nutrient losses from farming enterprises and therefore the requested amendment is unnecessary.
PC5LWRP-2171	Irrigation New Zealand Inc	Amend Rule 5.58A as follows: Within the Green or Light Blue zones the use of land for a farming activity that does not comply with rules 5.57C is a restricted discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-881	Opuha Water Limited	Retain Rule 5.58A(2) as notified.	Accept	We agree that retaining condition 2 of this rule is appropriate.
PC5LWRP-2440	Federated Farmers of New Zealand	Delete Rule 5.58A(2).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1203	Amuri Irrigation Co Limited	Amend Rule 5.58A(2) as follows: Delete the references to 30 June 2020 and 1 July 2020, and replace them with dates that do not cause unacceptable social and economic harm.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1843A	Forest and Bird NZ	Amend Rule 5.58A(2) to be consistent with relief sought on Policy 4.38C [PC5LWRP-1806].	Reject	The requested amendment is uncertain and would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-2025A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.58A(2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-134A	Hunter Downs Development Company Limited	Amend Rule 5.58A(2) as follows: 2. Any increase in the nitrogen loss rate occurs in circumstances where the anticipated environmental outcomes (as set out in Tables for the Green or Light Blue Nutrient Allocation Zone) continue to be met; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-348	DairyNZ	Amend Rule 5.58A (2) as follows: 2. ~~Until 30 June 2020, t~~T he nitrogen loss calculation for the part of the property within the Green or Light Blue Nutrient Allocation Zone does not exceed the ~~nitrogen baseline, and from 1 July 2020 the~~ Baseline GMP Loss Rate or the Loss Rate Assessed as Baseline GMP from 1 July 2020, unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful. Or words to similar effect.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-242	Dairy Holdings Limited	Amend 5.58A(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Green or Light Blue Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline ; or (ii) the nitrogen loss that 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	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		February 2016), and from 1 July 2020 the Baseline GMP Loss Rate, and....		
PC5LWRP-1584	Fertiliser Association of New Zealand	Amend Rule 5.58A(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-743	Fonterra Co-operative Group Ltd	Amend Rule 5.58A(2) as follows: Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Green or Light Blue Nutrient Allocation Zone does not exceed a total of 5kg/ha/yr above the nitrogen baseline, and from 1 July 2020 a total of 5kg/ha/yr above the ~~Baseline GMP Loss Rate~~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.		
PC5LWRP-740	Rangitata Diversion Race Management Limited	Amend Rule 5.58A(2) to delete references to 30 June 2020 and 1 July 2020, and replace them dates that do not cause unacceptable social and economic harm.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1203A	Amuri Irrigation Co Limited	Amend Rule 5.58A by inserting a new Condition (3) that enables consideration of farm activities that cannot be accurately modelled by the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-134B	Hunter Downs Development Company Limited	Amend Rule 5.58A by adding a new condition as follows: 3. ~~Until 30 June 2020, t~~The nitrogen loss calculation for the part of the property within the Orange Nutrient Allocation Zone does not, from 1 July 2020, exceed the Good Management Practice Loss Rate (based on the land use following intensification)~~the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate, unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful~~.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-740A	Rangitata Diversion Race Management Limited	Amend Rule 5.58A by adding a new Clause (3) that enables consideration of farm activities that cannot be accurately modelled by the Farm Portal.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1264	Canterbury District Health Board	Amend Rule 5.58A matter of discretion (3) to read: The actual or potential adverse effects of the activity on surface and groundwater quality and sources of drinking water and how these will be avoided and mitigated…	Accept	In response to this submission point we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1203B	Amuri Irrigation Co Limited	Amend Rule 5.58A matter of discretion (5) to read: Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and	Reject	The timeframe for compliance with the Baseline GMP Loss Rate + 5kg/ha/yr is a condition of entry to the rule. Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-740B	Rangitata Diversion Race Management Limited	Amend Rule 5.58A matter of discretion (5) to read: [5] Methods that limit the nitrogen loss ~~calculation~~ for the… Baseline GMP Loss Rate , and the timeframes for achieving the Baseline GMP Loss Rate; and		
PC5LWRP-2440A	Federated Farmers of	Delete Rule 5.58A matter of discretion (5).	Reject	The omission of this matter of discretion from this rule would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand			unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2171A	Irrigation New Zealand Inc	Amend Rule 5.58A by deleting matter of discretion (5).		
PC5LWRP-134C	Hunter Downs Development Company Limited	Amend Rule 5.58A by deleting matter of discretion (5).		
PC5LWRP-1203C	Amuri Irrigation Co Limited	Amend Rule 5.58A matter of discretion (6) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …"	Reject	The timeframe for compliance with the Baseline GMP Loss Rate is a condition of entry to the rule. Policies in Plan Change 5 already address the timeframes for compliance with Good Management Practice Loss Rates.
PC5LWRP-740C	Rangitata Diversion Race Management Limited	Amend Rule 5.58A matter of discretion (6) to read: Methods that require the farming activity to … Baseline GMP Loss Rate , and the timeframes for achieving the Good Management Practice Loss Rate …		
PC5LWRP-743B	Fonterra Co-operative Group Ltd	Amend Rule 5.58A(2) matter of discretion (6) to read: Methods that require the farming activity to operate at or below the ~~Good Management Practice Loss Rate~~Loss Rate Assessed as Good Management Practice , in circumstances where that ~~Good Management Practice Loss Rate~~Loss Rate Assessed as Good Management Practice is less than the ~~Baseline GMP Loss Rate~~Loss Rate Assessed as Baseline GMP;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-134D	Hunter Downs Development Company Limited	Amend Rule 5.58A by deleting matter of discretion (6).	Reject	The omission of these matters of discretion from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2171B	Irrigation New Zealand Inc	Amend Rule 5.58A by deleting matter of discretion (6).		
PC5LWRP-2171C	Irrigation New Zealand Inc	Amend Rule 5.58A by deleting matter of discretion (9).		
PC5LWRP-1203D	Amuri Irrigation Co Limited	Amend Rule 5.58A by deleting matter of discretion (10).		
PC5LWRP-740D	Rangitata Diversion Race Management Limited	Amend Rule 5.58A by deleting matter of discretion (10).		
PC5LWRP-2025B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.58A to insert a new matter for discretion to consider demonstration of meeting Good Management Practice; Or such other or alternative wording which would properly address the concerns raised.	Reject	Matter of discretion (4) already allows for consideration of this issue.
PC5LWRP-348A	DairyNZ	Amend Rule 5.58A matters of discretion as follows: Include an alternative consenting pathway which is developed in addition to the requirement to not exceed the Baseline GMP Loss Rate under Rule 5.58A; AND/OR Include an additional formal process for reviewing and moderating random portal results is developed and agreed with stakeholders, to be used either w here CRC has indications that the Baseline GMP Loss Rate calculated is inaccurate or the consent applicant considers this to be the case;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		AND/OR Amend Rule 5.58A matters for discretion to remove specific reference to the Baseline GMP Loss Rate and Good Management Practice Loss Rate in matters (5) and (6), and replace with a requirement that the consent applicant will demonstrate how the land use will meet the Industry GMP Practices. Or words to similar effect.		With regard to the rest of the submission we consider the amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-743A	Fonterra Co-operative Group Ltd	Amend Rule 5.58A as follows: Insert a new matter of discretion to read: 1A The estimation of the Loss Rate Assessed as Good Management Practice.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1264A	Canterbury District Health Board	Amend Rule 5.58A as follows: Insert a [new] section to explain at what level mitigation measures should be implemented.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 5.58B

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1844	Forest and Bird NZ	Retain Rule 5.58B as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-2033	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain the discretionary activity status of Rule 5.58B.	Accept	We agree that retaining a discretionary activity status is appropriate.
PC5LWRP-135	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1348	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 5.58B, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1487	Hurunui SNA Group & Rural Advocacy	Delete Rule 5.58B.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1681	Horticulture New Zealand	Delete Rule 5.58B.		
PC5LWRP-322	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.58B.		
PC5LWRP-1420	Beef and Lamb New Zealand Ltd	Delete Rule 5.58B and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-1084	Fonterra Co-operative	Amend Rule 5.58B so that the use of land for a farming activity as part of a farming enterprise is	Reject	The amendments requested would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Group Ltd	a controlled activity, with control reserved over the following matters: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate not exceeding the Baseline GMP Loss Rate; and 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 7. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 8. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 9. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 10. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1073	Dave Ashby Rural Consultants Limited	Amend Rule 5.58B to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-589	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.58B to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-163	Barton N	Amend Rule 5.58B to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-349	DairyNZ	Amend Rule 5.58B as follows: Insert additional discretionary criteria that provides a requirement that the consent applicant will demonstrate how the land use will meet the Industry GMP Practices.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2033A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 5.58B (2) to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		• Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.		See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1587	Fertiliser Association of New Zealand	Amend Rule 5.58B(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-349A	DairyNZ	Amend Rule 5.58B (2) as follows: 2. ~~Until 30 June 2020, t~~The nitrogen loss calculation for the farming enterprise does not exceed the ~~nitrogen baseline, and from 1 July 2020 the~~ Baseline GMP Loss Rate or the Loss Rate Assessed as Baseline GMP from 1 July 2020; and…		
PC5LWRP-1158	Opuha Water Limited	Amend Rule 5.58B(2) as follows: (2) Until 30 June 2020 the nitrogen loss calculation for the farming enterprise does not exceed the nitrogen baseline unless the nitrogen baseline has been lawfully exceeded prior to 13 February 2016; and, from 1 July 2020 the Good Management Practice loss rate; and... OR words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-243	Dairy Holdings Limited	Amend 5.58B(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for that part of the property in the Green or Light Blue Nutrient Allocation Zone does not exceed: (i) the nitrogen baseline; or (ii) the nitrogen loss that 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 from 1 July 2020 the Baseline GMP Loss Rate, and....		
PC5LWRP-2441	Federated Farmers of New Zealand	Delete Rule 5.58B(2).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.

Rule 5.59A

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2444	Federated Farmers of New Zealand	Retain Rule 5.59A subject to deleting Rule 5.58A(2) and Rule 5.58B(2).	Accept in part	We agree that retaining this rule is appropriate. We consider omitting the other rules would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1845	Forest and Bird NZ	Retain Rule 5.59A as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-352	DairyNZ	Retain Rule 5.59A as notified, provided the relief sought in PC5LWRP-314 (Rule 5.44B), PC5LWRP-318 (Rule 5.45A) and PC5LWRP-331 (Rule 5.46A) is adopted.	Accept in part	We agree that retaining this rule is appropriate. We consider amending the other rules would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-136	Hunter Downs Development Company Limited	Delete the restrictions on intensification in orange and blue and green zones. Amend the rules to allow for intensification up to a good management practice loss rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2173	Irrigation New Zealand Inc	Delete Rule 5.59A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1488	Hurunui SNA Group & Rural Advocacy	Delete Rule 5.59A.		giving effect to the superior instruments.
PC5LWRP-1421	Beef and Lamb New Zealand Ltd	Delete Rule 5.59A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.	Reject	The request for an approach based on 'natural capital' does not give precise details of amendments requested, and is therefore recommended to be rejected.
PC5LWRP-323	Ellesmere Sustainable Agriculture Inc	Delete Rule 5.59A.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-591	Egg Producers Federation and Poultry Industry Association	Amend Rule 5.59A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-165	Barton N	Amend Rule 5.59A to include intensification up to a good management practice loss rate for the land use authorised by a water permit granted prior to 13 February 2016.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2034	Ravensdown Limited	Amend Rule 5.59A from a non-complying activity to a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1591	Fertiliser Association of New Zealand	Amend Rule 5.59A from a non-complying activity to a discretionary activity.		

Section 16 Schedules

New Schedule Sought

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1782	Forest and Bird NZ	Amend to include a schedule outlining the knowledge and competencies required for approval to be considered by the CE of ECAN as an 'Accredited Farm Consultant'.	Reject	The definition of Accredited Farm Consultant sets out the qualifications that are required.

Schedule 7 Farm Environment Plan

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1101	White K A	Retain audited FEPs.	Accept	We consider retaining provisions that require auditing of FEPs will assist in achieving the objectives of the LWRP
PC5LWRP-2770	Spectrum Group	Retain the use of Farm Environment Plan. However, the focus should be on practices rather than a means to "trip you up".	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-706	North Canterbury Fish and Game & SI Fish and Game	Retain Schedule 7 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2636	Kakahu Catchment Group	Retain Farm Environment Plan and amend to place emphasis on practices rather than a number.	Accept in part	We recommended amendments to Schedule 7 to align the targets and objectives of the schedule with the Industry-agreed Good Management Practices relating to water quality. However we also recommend retaining provisions in Plan
PC5LWRP-2637	Craigmore Farming	Retain Farm Environment Plan and amend to place emphasis on practices.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				Change 5 that require compliance with nitrogen loss rate limits.
PC5LWRP-1593A	Fertiliser Association of New Zealand	Retain Schedule 7 part C, but given roles described for the Certified Farm Environment Plan Auditor, consider the necessity of the auditor to also be a Certified Nutrient Management Adviser [OR, modify the requirements to one of auditing the nutrient budget 'process' to ensure nutrient budgets are robust, rather than auditing nutrient budgets themselves].	Reject	We have considered the qualification requirements for Certified Farm Environment Plan Auditors and recommended amendments which require Certified Farm Environment Plan Auditors to hold an Advanced Certificate in Sustainable Nutrient Management.
PC5LWRP-1272	Canterbury District Health Board	Retain the reference to 'microbial pathogens' in Management Area: 'Waterbody Management' Objective as notified.	Accept	We agree that retaining reference to 'microbial pathogens' in this management objective is appropriate.
PC5LWRP-354C	DairyNZ	Retain the following Schedule 7 Management Areas as notified: 'Soils Management' 'Collected Animal Effluent Management' 'Point Sources (offal pits, farm rubbish pits, silage pits)' 'Water-use Management (excluding irrigation water)'	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are substantially retained.
PC5LWRP-354D	DairyNZ	Retain Schedule 7 Part C as notified.		
PC5LWRP-354E	DairyNZ	Retain phosphorus risk map, and the requirement for FEPs to identify critical source areas for phosphorus or sediment loss for any part of the property that is within a Phosphorus Risk Zone.		
PC5LWRP-1553	Beef and Lamb New Zealand Ltd	Delete Schedule 7 definition of Management Area and replace with: Good Management Practices: means the aspects of Good Management Practice that must be addressed, noting that other aspects relevant to a property may also be included. • Farm Planning and records • Cultivation and soil structure • Ground cover • Sediment, phosphorus and faecal bacteria Nutrient Management • Nutrient Management • Irrigation and water use Or words to similar effect.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1589	Beef and Lamb NZ	Delete Schedule 7 and replace with a new Schedule 7 prepared in consultation with the industries that developed the GMPs adopted by Plan Change 5 and now forming part of the LWRP.	Reject	This submission point does not give precise details of the amendments requested to Schedule 7.
PC5LWRP-1553F	Beef and Lamb New Zealand Ltd	Delete Schedule 7 and replace with: A new Schedule 7 prepared in consultation with the industries that developed the GMPs adopted by Plan Change 4 and now forming part of the LWRP.		
PC5LWRP-2325	Federated Farmers of New Zealand	Delete the amendments to Schedule 7. OR If the amendments are retained: 1) Amend part 2(g) to refer only to P loss where there is potential for erosion (e.g. on erosion prone soils on hill country), where there is potential for loss of P along with sediment loss. 2) Ground-truth the map of High Runoff Risk Phosphorus Zones. 3) Provide an alternative pathway for farm systems and individual situations where the Farm Portal is not capable or produces aberrant results.	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. We do not agree it is appropriate to limit Part 2(g) of the schedule to only areas where there is a potential for soil erosion.
PC5LWRP-224	Ellesmere Sustainable Agriculture Inc	Delete amendment to Clause (b) below and make any consequential amendments. (b) ~~defined measurable targets that clearly set a pathway and timeframe for achievement~~	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		~~and set out defined and auditable "pass/fail" criteria~~ a description of the actions and Good Management Practices (and a timeframe within which those actions will be completed) that will be implemented to achieve the objectives and targets.		
PC5LWRP-643	Lee D	Delete Schedule 7 Part A Part B and Part C – submitter seeks market gardening be exempt.	Reject	The omission requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2417	McLean G and M	Delete proposed PC5 amendments to Schedule 7.		
PC5LWRP-2553	Maungatahi Farm Limited	Delete proposed PC5 amendments to Schedule 7.		
PC5LWRP-2271	Hoban J K W	Delete proposed PC5 amendment to Schedule 7.		
PC5LWRP-2470	Forrester K	Delete proposed PC5 amendment to Schedule 7.		
PC5LWRP-2502	Forrester J and R	Delete proposed PC5 amendment to Schedule 7.		
PC5LWRP-2045	Murchison JG and LM	Delete PC5 amendments to Schedule 7.		
PC5LWRP-2226	Sloss K	Delete PC5 amendments to Schedule 7.		
PC5LWRP-2412	Rangatahi Downs Land Trust	Delete PC5 amendment to Schedule 7.		
PC5LWRP-2595	Munro A R and K H	Delete PC5 amendment to Schedule 7.		
PC5LWRP-325	Ellesmere Sustainable Agriculture Inc	Delete Part B (2)(g).	Reject	The omission would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2094B	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Delete Schedule 7 Part B (2)(i).	Reject	The omission of this part of the schedule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-325D	Ellesmere Sustainable Agriculture Inc	Delete Part B (4B)(a).		
PC5LWRP-325E	Ellesmere Sustainable Agriculture Inc	Delete Part B (4B)(b).	Accept in part	We agree that omitting clauses (i) to (iv) of Part B(4B)(b) is appropriate.
PC5LWRP-2176A	Irrigation New Zealand Inc	Delete Part B (4B)(b).		
PC5LWRP-325F	Ellesmere Sustainable Agriculture Inc	Delete Part B (5).	Reject	The omission of this part of the schedule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-325A	Ellesmere Sustainable Agriculture Inc	Delete Target 1 of the 'Management Area: Nutrient Management'.		
PC5LWRP-2094L	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers	Delete Schedule 7 Part B Management Area: Nutrient Management Target 3.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Association			
PC5LWRP-2094J	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Delete Schedule 7 Part B Management Area: Collected Animal Effluent Management Target 1.	Reject	The original provision is recommended to be omitted and replaced with more appropriate wording that refers to industry codes of practice.
PC5LWRP-1846D	Forest and Bird NZ	Delete Waterbody Management Target (1) and replace with a stock exclusion target as follows: cattle deer pigs are excluded from all permanently flowing waterbodies and intermittent waterbodies greater than 1m active bed on flat and rolling country and in the hill country are excluded from critical source areas, wetlands and lakes, and excluded from all waterbodies if mob stocked (set stocked behind a wire).	Reject	Provisions in the LWRP already address the matter of stock exclusion from waterbodies.
PC5LWRP-2094G	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Delete Schedule 7 Part B Management Area: Water Use Management.	Reject	The omission of this part of the schedule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-685E	Barrhill Chertsey Irrigation Scheme	Delete Management Area: Water-use Management (excluding irrigation water) or the Management Area: Water-use Management (excluding irrigation water) should be amended to achieve the same outcome as set out above.		
PC5LWRP-2042	Ravensdown Limited	Amend Schedule 7 to: a) Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; b) Provide an additional formal process for reviewing and moderating inaccurate portal results; c) Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1593	Fertiliser Association of New Zealand	Amend Schedule 7 to provide for an alternative pathway to the Farm Portal where required.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-592	Egg Producers Federation and Poultry Industry Association	Amend Schedule 7 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1553A	Beef and Lamb New Zealand Ltd	Amend Schedule 7 definitions as follows: ~~Management Objective~~Good Management Practice – means the overarching outcome sought in relation to each ~~Management Area~~Good Management Practice as included through PC5. ~~Target~~ Objective - means a measurable auditable statement that contributes to achievement of the ~~Management Objective~~Good Management Practice		
PC5LWRP-1846	Forest and Bird NZ	Amend Schedule 7 Management Area definition as follows:	Accept in part	In response to this submission we recommend an amendment

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Management Area - means an area over which any of the following apply … OR Management Area - means the practice of any of the following … OR Means an area of management as set out in the Management Plan requirements schedule 7 and includes the following topics … OR Means an area of farm management practice as set out in the Management Plan requirements schedule 7 and includes the following topics …		to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-715D	Horticulture New Zealand	Amend Schedule 7 to include the definition: Farm Environment Plan means a plan that describes the objectives and targets for environmental management of a property for the management areas listed in Schedule 7. A Farm Environment Plan can be based on either: a) the criteria in Schedule 7 Part B; or b) an industry prepared Farm Environment Plan template or an Industry Audited Self-Management Programme which is approved by the Chief Executive of Canterbury Regional Council as meet the criteria set out in Schedule 7 Part A (2)(a).	Reject	Provisions in Schedule 7 of the LWRP already address these matters.
PC5LWRP-715E	Horticulture New Zealand	Amend Part A, Schedule 7, as follows: (2) Industry prepared Farm Environment Plan templates, Industry Audited Self- Management Programmes and guidance material that:...	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1846A	Forest and Bird NZ	Amend Part B - Farm Environment Plan Default Content as follows: Amend the Schedule 7 Part B to include outstanding waterbodies, and sensitive receiving environments eg inanga spawning or salmonid spawning habitats.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1553E	Beef and Lamb New Zealand Ltd	And amend Schedule 7 Part B – Farm Environment Plan Default Content section 5 to include: For each objective and target detail commensurate with the scale of the environmental effects and risks and a description of the actions and Good Management Practices (and a timeframe within which those actions will be completed) that will be implemented to achieve the objectives and targets. Or words to similar effect.	Reject	Provisions in Plan Change 5 already address these matters.
PC5LWRP-685	Barrhill Chertsey Irrigation Scheme	Insert into Part B as follows: 1A: Base land use description as follows: Where the farming activity or farming enterprise is not being managed under a resource consent held by an irrigation scheme or principal water supplier, the base land use description is the land use within the baseline period. Where the farming activity or farming enterprise is being managed under a resource consent held by an irrigation scheme or principal water supplier, the base land use description applies at the date determined by the Environmental Management Strategy, and shall include a description of the (a) Area of property; (b) Farm system description; (c) Area and method(s) of irrigation; (d) Area and timing of winter grazing; (e) Stock type and Relative stock units per hectare; and (f) Average nitrogen fertiliser inputs (kg N/ha)	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1272B	Canterbury District	Insert a new section in Part B(2), Schedule 7, requiring the identification of unprotected		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Health Board	aquifers, direction of groundwater flow, and drinking water sources to be indicated on maps or aerial photograph accompanying the farm plan.		
PC5LWRP-715F	Horticulture New Zealand	Add to Clause 2(b) references to external documents that are used by Council in assessing programmes and provide such materials for public consultation and input.		
PC5LWRP-715G	Horticulture New Zealand	Add an additional approval option to Clause 2(b): (ii) Where the programme seeking approval has an integrated audit programme the approval of the programme may include approval of the audit programme.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1553B	Beef and Lamb New Zealand Ltd	Amend Schedule 7 Part B(2)(f) as follows 2. (f) The location of any areas within the property or adjoining the property and are hydrologically connected, that are identified in a District Plan as 'significant indigenous biodiversity".	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1553C	Beef and Lamb New Zealand Ltd	Amend Schedule 7 Part B(2)(g) as follows (g) The location of any critical source areas, including but not limited to phosphorus for any part of the property within the Phosphorus Risk Zone, sediment, faecal bacteria, nitrogen.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1846B	Forest and Bird NZ	Amend Part B(2)(g) to delete "within phosphorus risk zone'.		
PC5LWRP-2094	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part B (2)(g) as follows: (g) The location of any known critical source areas for phosphorus or sediment loss for any part of the property ~~within the Phosphorus Risk Zone~~ .		
PC5LWRP-1553D	Beef and Lamb New Zealand Ltd	Amend Schedule 7 Part B(2)(i) as follows: (i) ~~Public access routes or a~~Access routes used to maintain the rivers, streams or drains.		
PC5LWRP-813	Purata Farming Ltd	Amend Schedule 7 Part B(2)(i) to explain the terms: 'public access routes' and 'access routes'.	Reject	The meaning of these terms is to be their ordinary meaning.
PC5LWRP-1846C	Forest and Bird NZ	Amend Part B(4A) to include prevention of any overland flow of contaminants, achievement of N loss standards or reduction in N leaching.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1075	Dave Ashby Rural Consultants Limited	Amend Schedule 7 Part B(4B) to exclude reference to Baseline GMP Loss Rate.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-715B	Horticulture New Zealand	Simplify the provision of reports required under Part B(4B)	Reject	We consider the reports required by this part of the schedule are appropriate.
PC5LWRP-685A	Barrhill Chertsey Irrigation Scheme	Amend 4B to include new introductory wording: 4B Where the nitrogen loss from the farming activity or farming enterprise is not being managed under a resource consent held by an irrigation scheme or principal water supplier :...	Reject	Amendments that we recommend to the policies address these matters.
PC5LWRP-636	Central Plains Water Ltd	Amend clause 4B as follows & retain schedule 7: 4B Where the nitrogen loss from the farming activity or farming enterprise is not being managed under a resource consent held by an irrigation scheme or principal water supplier :...		
PC5LWRP-245	Dairy Holdings Limited	Amend clause 4B as follows & retain schedule 7:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		4B Where the nitrogen loss from the farming activity or farming enterprise is not being managed under a resource consent held by an irrigation scheme or principal water supplier :…		
PC5LWRP-138	Hunter Downs Development Company Limited	Amend clause 4B as follows & retain schedule 7: 4B Where the nitrogen loss from the farming activity or farming enterprise is not being managed under a resource consent held by an irrigation scheme or principal water supplier :…		
PC5LWRP-2176	Irrigation New Zealand Inc	Amend Schedule 7 clause 4B as follows: 4B (a) Pre 30 June 2020 a nutrient budget that shows the Nitrogen Baseline and post 1 July 2020 a Baseline GMP Loss Rate or a nitrogen loss calculation that demonstrates implementation of Good Management Practices for the farming activity over the baseline period, at the dates specified below: - Red, Orange and Lake 1 July 2017 - Green and Blue Zone 1 January 2018	Reject	We have recommended the omission of this part of the schedule as the policies in Plan Change 5 provide direction on the date by which compliance with Baseline GMP Loss Rates and Good Management Practice Loss Rates is to be achieved.
PC5LWRP-2042A	Ravensdown Limited	Amend Part B – Farm Environment Plan Default Content, clause 4B(a)as follows: (a) ~~a~~ nutrient budgets which show~~s~~ the nitrogen baseline and nitrogen loss calculation for the property, or farming enterprise; and	Accept	We agree the typographical errors should be corrected and recommend amendments accordingly.
PC5LWRP-2042C	Ravensdown Limited	Amend Part B – Farm Environment Plan default content, clause 4B (b) as follows (i) From 1 July ~~2016~~2018 for any property within the Lake Zone; (ii) From 1 January ~~2017~~2019 for any property or farming enterprise within the Orange Nutrient Allocation Zone; (iii) From 1 July ~~2017~~2019 for any property or farming enterprise within the Red Nutrient Allocation Zone; (iv) From 1 January ~~2018~~2020 for any property or farming enterprise within the Green or Light Blue Nutrient Allocation Zone.	Reject	We have recommended the omission of this part of the schedule as the policies in Plan Change 5 provide direction on the date by which compliance with Baseline GMP Loss Rates and Good Management Practice Loss Rates is to be achieved.
PC5LWRP-715C	Horticulture New Zealand	Insert a new clause (c) to Schedule 7, Part 4B, after clauses a) and b), as follows: b) …. or; c) the MGM proxy for the farm type overlaid with soil and climate data for the farm where the farm system cannot be adequately represented through OVERSEER® and the Farm Portal.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-685B PC5LWRP-636A PC5LWRP-245A PC5LWRP-138A	Barrhill Chertsey Irrigation Scheme Central Plains Water Ltd Dairy Holdings Limited Hunter Downs Development Company Limited	Include a new clause 4C: 4C Where the nitrogen loss from the farming activity or farming enterprise is being managed under a resource consent held by an irrigation scheme or principal water supplier: a. a description of how the conditions of the resource consent held by the irrigation scheme or principal water supplier that relate to nitrogen loss on the individual propert(ies) are being met.	Reject	Amendments that we recommend to the policies address these matters.
PC5LWRP-715	Horticulture New Zealand	Amend Schedule 7 Part B Management Areas so that the requirements are certain and quantifiable.	Accept in part	We are recommending amendments accordingly.
PC5LWRP-1593B	Fertiliser Association of New Zealand	Amend the objective in Schedule 7 Part B, Management Area, Nutrient Management as follows: To ~~maximise~~manage nutrient use ~~efficiency~~responsibly while minimising losses to water.	Accept in part	In response to this and other submissions we recommend some amendments in response to this submission point, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2042B	Ravensdown Limited	Amend Schedule 7, Management Area **:** Nutrient Management as follows: Objective: To ~~maximise~~ manage nutrient use ~~efficiency~~ responsibly while minimising nutrient		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		losses to water.		
PC5LWRP-2094A	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part B Management Area: Nutrient Management as follows: Objective: To ~~maximise nutrient use efficiency while~~ minimise~~ing~~ nutrient losses to water.		
PC5LWRP-685C	Barrhill Chertsey Irrigation Scheme	Amend Management Area: Nutrient Management to read: Target (1) Nitrogen losses from farming activities are at or below the Good Management Practice; or are compliant with the Scheme Nitrogen Discharge Allowance; or any applicable and consented nitrogen loss rates. Target (1A) Nitrogen losses to groundwater from farming activities are minimised.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2094C	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part B Management Area: Nutrient Management Targets as follows: (1) Modelled ~~N~~nitrogen losses from farming activities are at ~~or below~~ Good Management Practice Loss Rates for the property. (2) Phosphorus and sediment ~~losses~~transport to water bodies from farming activities are minimised.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-354	DairyNZ	Amend Management Area 'Nutrient Management' Target (3) as follows: 3. The amount and rate of fertiliser applied is matched to the predicted ~~does not exceed the~~ agronomic requirements of the crop.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2042D	Ravensdown Limited	Amend Schedule 7, Management Area: Nutrient Management Target 3 as follows: (3) The amount and rate of fertiliser applied ~~does not exceed the~~ is matched the predicted agronomic requirements of the crop. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-2094I	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Irrigation Management to achieve re-wording in partnership with irrigation experts to better reflect good management practices and environment outcomes.	Accept in part	We have recommended some amendments to better align the schedule with the Industry agreed Good Management Practices relating to water quality.
PC5LWRP-2176B	Irrigation New Zealand Inc	Amend Schedule 7 Management Area: Irrigation Management Target 1 as follows: (1) New irrigation systems are designed and installed ~~and operated~~ in accordance with industry ~~best practice~~ codes of practice and standards	Accept	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-354A	DairyNZ	Amend Management Area 'Irrigation Management target 1' as follows: 1. New irrigation infrastructure is designed, installed and operated in accordance with industry ~~best~~ good practice standards.	Accept in part	In response to this submission we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2176C	Irrigation New Zealand Inc	Amend Schedule 7 Management Area: Irrigation Management Target 2 as follows: (2) Existing irrigation systems have an annual performance assessment and are maintained so as they apply irrigation at their optimal efficiency.		
PC5LWRP-2176D	Irrigation New Zealand Inc	Amend Schedule 7 Management Area: Irrigation Management Target 3 as follows: (3) All applications of irrigation are justified through soil moisture monitoring or soil water budgets		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2176E	Irrigation New Zealand Inc	Amend Schedule 7 Management Area: Irrigation Management Target 4 as follows: (4) The timing and depth of irrigation applied takes account of crop requirements and soil plant available water.		
PC5LWRP-354F	DairyNZ	Amend Management Area 'Irrigation Management target 4' as follows: 4. The timing and rate of application of water is managed so as to minimise the risk of exceeding ~~not exceed~~ crop requirements or the available water holding capacity of the soil. Staff are trained in the operation, maintenance and use of irrigation systems.	Reject	We have recommended other amendments to this part of the schedule that address the matter raised in this submission point.
PC5LWRP-813A	Purata Farming Ltd	Amend Schedule 7 Target (5),'Management Area: Irrigation Management' as follows: (5) Appropriate staff are trained ...		
PC5LWRP-2094D	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part B Management Area: Soils Management as follows: Objective: To ~~maintain or improve the physical and biological condition of~~manage soils in order to minimise the movement of sediment, phosphorus and other contaminants to waterways.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2094E	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part B Management Area: Collected Animal Effluent Management as follows: Targets: (2) The timing and rate of application of effluent ~~and solid animal waste~~ to land is managed so as to minimise the risk of contamination of groundwater or surface water bodies...	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-813B	Purata Farming Ltd	Amend Schedule 7 Target (4), 'Management Area: Collected Animal Effluent Management' as follows: (5) Appropriate staff are trained...		
PC5LWRP-325B	Ellesmere Sustainable Agriculture Inc	And Amend 'Management Area: Waterbody Management' as follows: To manage wetlands, riparian areas and surface waterbodies to avoid damage to the bed and margins of a waterbody, and to avoid the direct input of nutrients, sediment and microbial pathogens that do not meet regional council rules	Reject	We do not consider the requested amendment is necessary as compliance with the regional council rules is a requirement under the RMA.
PC5LWRP-354B	DairyNZ	Amend Management Area 'Waterbody Management (wetlands, riparian areas, drains, rivers, lakes)' Target (3) as follows: 3. Farm tracks, gateways, water troughs, self- feeding areas, stock camps, wallows, and similar livestock influenced ~~other~~ sources of sediment, nutrient and microbial loss are located so as to minimise the risks to surface water quality.	Accept in part	In response to this submission we recommend an amendment to this target to recognise other farming activities that are potential sources for sediment, nutrient and microbial loss.
PC5LWRP-2094F	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part B Management Area: Waterbody Management (wetlands, riparian areas, drains, rivers, lakes) Target 3 as follows: (3) Farm tracks, gateways, water troughs, self-feeding areas, stock camps wallows and other sources of run-off (that contribute to loss of sediment, nutrient and faecal bacteria~~microbial loss~~) are located so as to minimise the risks to surface water quality.	Accept in part	In response to this submission we recommend an amendment to this target to recognise other farming activities that are potential sources for sediment, nutrient and microbial loss. However, we are not persuaded that the amendment to replace the phrase 'microbial loss' with 'faecal bacteria' would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1272A	Canterbury District Health Board	Amend Schedule 7, Farm Environment Plan as follows: Insert new sections in Management Areas: 'Waterbody Management' and 'Point Sources' that specify what trigger level mitigation measures should be implemented. e.g. half the maximum acceptable value for nitrate.		
PC5LWRP-685D	Barrhill Chertsey	Amend Management Area: Water-use Management (excluding irrigation water) to water:	Reject	We are not persuaded that the amendment requested would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Irrigation Scheme	*Management Area: ~~Irrigation~~ Water Use Management* … Target: (6) Actual consented water use for other water uses (excluding irrigation) is efficient for the end use. The plan shall only apply to water that is taken under a resource consent. Water taken under section 14(3)(b) or a permitted activity rule is not controlled by the Farm Environment Plan. The plan shall include for each objective and target in section 5 above: (a) detail commensurate with the scale of the environmental effects and risks; (b) a description of the actions and Good Management Practices (and a timeframe within which those actions will be completed) that will be implemented to achieve the objectives and targets. (c) the records required to be kept for measuring performance and achievement of the targets and objectives.		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-245C	Dairy Holdings Limited	Amend the management area relating to non-irrigation water to include the following: The plan shall only apply to water that is taken under a resource consent. Water taken under section 14(3)(b) or a permitted activity rule is not controlled by the Farm Environment Plan.		
PC5LWRP-245C	Dairy Holdings Limited	Amend the management area relating to non-irrigation water to include the following: The plan shall only apply to water that is taken under a resource consent. Water taken under section 14(3)(b) or a permitted activity rule is not controlled by the Farm Environment Plan.		
PC5LWRP-861	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Schedule 7 Part B(5) to include a new Management Area as follows: Management Area - Mahinga kai values and other sites of importance to Ngāi Tahu 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. Targets - • 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. • Managing the effects of farming activities to avoid adverse effects to mahinga kai, wāhi tapu or wāhi taonga.	Accept in part	In response to this submission point we are recommending inserting a specific reference to mahinga kai values in the targets for Management Area: Waterbodies.
PC5LWRP-715A	Horticulture New Zealand	Amend Schedule 7 Part C by removing italics and referring to Environment Canterbury Certified Farm Environment Plan Auditor Manual February 2016, which sets out the criteria and methods for undertaking a Farm Environment Plan audit.	Reject	We do not consider it necessary to amend the schedule to directly refer to the manual.
PC5LWRP-2094M	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7 Part C to achieve a process of peer review of the Canterbury Certified Farm Environment Plan Auditor Manual and to explain how the Auditor Manual will be updated to include any changes made.	Reject	It is not appropriate that the LWRP or any change to it direct the executive functions of the Council.
PC5LWRP-325C	Ellesmere Sustainable Agriculture Inc	Amend Part C-Farm Environment Plan Audit Requirements to exclude reference to Good Management Practices.	Accept	We agree it is appropriate to remove the explicit reference to good management practices in this part of the schedule.
PC5LWRP-2415	McLean G and M	Submitter states that it isn't clear whether the Farm Environment Plan templates already approved by ECAN as complying with Schedule 7 will need to be amended and reapproved for compliance with the amended Schedule 7. If so, the reason that justifies the cost of doing this and the confusion for people who have started using them.	Reject	A general request that does not give precise details of the amendment requested.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2094K	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	The submitter supports other submissions from primary industries including Beef + Lamb and Horticulture New Zealand that seek to positively foster behaviour change.	Accept in part	Provisions in Plan Change 5 already address these matters.

Schedule 7A Management Plan for Farming Activities

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-312	DairyNZ	Retain Schedule 7A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they substantially retained.
PC5LWRP-444	Horticulture New Zealand	Retain Schedule 7A as notified.		
PC5LWRP-883	Opuha Water Limited	Retain Schedule 7A as notified.		
PC5LWRP-1599	Fertiliser Association of New Zealand	Retain Schedule 7A as notified.		
PC5LWRP-2052	Ravensdown Limited	Retain Schedule 7A as notified		
PC5LWRP-1484	Hurunui SNA Group & Rural Advocacy	Delete Schedule 7A.	Reject	The omission of this schedule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2177	Irrigation New Zealand Inc	Delete Schedule 7A.		
PC5LWRP-2533	Anderson D & K and Anderson B & M	Delete Schedule 7A.		
PC5LWRP-1919	Murchison JG and LM	Delete Schedule 7A.		
PC5LWRP-2182	Sloss K	Delete Schedule 7A.		
PC5LWRP-2355	Rangatahi Downs Land Trust	Delete Schedule 7A.		
PC5LWRP-2469	Forrester K	Delete Schedule 7A.		
PC5LWRP-2571	Munro A R and K H	Delete Schedule 7A.		
PC5LWRP-2269	Hoban J K W	Delete Schedule 7A.		
PC5LWRP-2354	McLean G and M	Delete Schedule 7A.		
PC5LWRP-2468	Forrester J and R	Delete Schedule 7A.		
PC5LWRP-2546	Maungatahi Farm Limited	Delete Schedule 7A.		
PC5LWRP-1590	Beef and Lamb New Zealand Ltd	Delete Schedule 7A and replace with a new Schedule 7A prepared in consultation with the industries that developed the GMPs adopted by Plan Change 5 and now forming part of the LWRP.	Reject	This submission point does not give precise details of the amendments requested to Schedule 7A. However, in response to other submissions, and for the reasons set out in those submissions or advanced in the evidence, we

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				are recommending amendments to Schedule 7A to more closely align the content of the schedule with the *Industry-agreed good management practices relating to water quality.*
PC5LWRP-2134	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Delete the Table in Point 3 of Schedule 7A and replace with a list of industry agreed good management practices; OR Amend the table [in partnership with primary industry organisations] to better reflect good practices aimed at environmental outcomes.	Accept in part	In response to this and other submissions, and for the reasons set out in those submission or advanced in the evidence, we are recommending amendments to Schedule 7A to more closely align the content of the schedule with the *Industry-agreed good management practices relating to water quality.*
PC5LWRP-2326	Federated Farmers of New Zealand	Delete Schedule 7A and require permitted activities to operate at good management practice as defined in the document 'Industry-agreed Good Management Practices relating to water quality'.		
PC5LWRP-1021	Banks B	Delete Schedule 7A and replace with condition requiring all farmers to operate in accordance with an industry recognised farm management programme or in accordance with any relevant provisions in the Industry-Agreed Good Management Practices Relating to Water Quality - September 2015.		
PC5LWRP-1621	Banks J and T	Delete requirement to prepare a Farm Environment Plan and replace with a condition requiring all farmers to operate in accordance with an industry-recognised farm environment programme run by representative bodies and farm consultancies or in accordance with any relevant provisions in the Industry-Agreed Good Management Practices Relating to Water Quality - September 2015.		
PC5LWRP-1847	Forest and Bird NZ	Amend Schedule 7A to clearly define good practice.		
PC5LWRP-2134B	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7A to explicitly state the intent for land managers to regularly review activities that have an environmental impact, and list management practices specific to permitted activities that are more appropriate, to be selected by the land manager.		
PC5LWRP-593	Egg Producers Federation and Poultry Industry Association	Amend Schedule 7A to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-251	Ellesmere Sustainable Agriculture Inc	Amend Schedule 7A (2)(c) as follows: (c) the location of permanent or intermittent rivers, streams, lakes, drains, ponds or wetlands and ephemeral drains . And delete the Good Practices in the Good Practice Table (3).		
PC5LWRP-2134A	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Schedule 7A 2.(g) as follows: The location of any known critical source areas for phosphorus loss for any part of the property ~~within the High Runoff Risk Phosphorus Zone~~.		
PC5LWRP-863	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming	Amend Schedule 7A(3) to include an additional on-farm action as follows: 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	Reject	While we understand the reason for this amendment request, we consider that it would introduce uncertainty in the scope of the Schedule which would be inappropriate for an instrument

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited	any property or farming enterprise.		referenced by a permitted activity rule.
PC5LWRP-707	North Canterbury Fish and Game & SI Fish and Game	Amend Schedule 7A to insert methods by Environment Canterbury to achieve effective monitoring, education and actions under Schedule 7A, clause 4. The submitter seeks the methods included in the decision requested in Policy 4.38B (PC5LWRP-695). AND further or alternative relief to the effect of that sought.	Accept in part	In response to this submission we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2134C	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	The submitter supports other submissions from primary industries including Beef + Lamb and Horticulture New Zealand that seek to positively foster behaviour change.	Accept in part	Provisions in Plan Change 5 already address these matters.
PC5LWRP-2511	Holland D G	Adopt a catchment board model instead of management plans.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.

Schedule 28 Good Management Practice Modelling Proxies

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1848	Forest and Bird NZ	Retain Schedule 28 as notified.	Accept in part	A number of submissions sought changes to the introductory text in the schedule or the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
PC5LWRP-308	DairyNZ	Retain the intent of Schedule 28 to include the modelling proxies within PC5. Amend Schedule 28 to include the following explanation: The modelling rules within Schedule 28 have been developed through a technical process including primary industry representatives. Any further changes to this schedule should be endorsed by the Good Management Practice Governance Group which includes primary sector representatives from the six sectors involved with the development of the Matrix of Good Management project (2015). Or words to similar effect.		
PC5LWRP-1853	Fonterra Co-operative Group Ltd	Retain 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.		
PC5LWRP-1144	Burke G J	Retain Schedule 28 requirement for good management practices being demonstrated on farm, and amend to ensure good management practices include catchment specific and actual on-farm practices.		
PC5LWRP-1555	Horticulture New Zealand	Delete Schedule 28.	Reject	We consider it appropriate to retain Schedule 28 as it describes the modelling proxies and OVERSEER settings and parameters used by the Farm Portal when estimating Baseline GMP Loss Rates and Good Management Practice Loss Rate numbers.
PC5LWRP-2053	Ravensdown Limited	Delete the content of Schedule 28 to effectively leave it blank to be populated when modelling issues are resolved. The submitter seeks a robust validation process of the proxies including: 1. An assessment of the individual input proxies to ascertain the extent of any errors or variances, for each input proxy. 2. Once each input proxy has been assessed individually, a reassessment of the farm proxies is undertaken to ascertain the extent of any errors or variances across		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		different farm types. In the interim, a consenting pathway is developed to provide an alternative to the consenting pathway presented using the proxies. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-283	Ellesmere Sustainable Agriculture Inc	Delete Schedule 28 'Good Management Practice Modelling Rules'.		
PC5LWRP-2179	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Delete Schedule 28 and replace with a collaborative structure to oversee ongoing refinements to incorporating new information into modelling good management practices using OVERSEER®.		
PC5LWRP-810	Purata Farming Ltd	Delete reference to the Farm Portal to allow refinement and adopt Industry Good Management Practices.		
PC5LWRP-2536	Irrigation New Zealand Inc	Delete Method s28.3.		
PC5LWRP-141	Hunter Downs Development Company Limited	Amend the explanation in Schedule 28: The Farm Portal (www.farmportal.ecan.govt.nz) is a web-based tool that estimates the nutrient losses from a farming activity operating under Good Management Practice. The Farm Portal achieves this by applying a set of modelling proxies that correlate with 'Good Management Practice' to uploaded OVERSEER® nutrient budgets. The proxies are not intended to be overly prescriptive and by their nature it will not be possible for proxies to represent capture every farming activity. An alternative consenting pathway (that does not rely on the proxies) is therefore set out in rules. The intent of the proxies and the Farm portal is that they reflect the industry defined Good Management Practices.	Reject	We have recommended other amendments to Plan Change 5 that provide for the use of an alternative to the Farm Portal, and for that reason the requested amendment is unnecessary.
PC5LWRP-594	Egg Producers Federation and Poultry Industry Association	Amend Schedule 28 to exclude poultry farming or such other alternative relief to satisfy the concerns of the submitter.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1997	Bellfield Land Co Ltd	Amend to ensure the MGM narratives used to input rules in OVERSEER® are robust and reflect actual farming systems throughout Canterbury. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Accept in part	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
PC5LWRP-124	Hunter Downs Development Company Limited	Amend to ensure Schedule 28 to correctly reflect good management practices.		
PC5LWRP-355	Dairy Holdings Ltd	Amend to ensure Schedule 28 to correctly reflect the intended good management practices.		
PC5LWRP-640	Central Plains Water Ltd	Amend to ensure Schedule 28 to correctly reflect good management practices.		
PC5LWRP-686	Barrhill Chertsey Irrigation Scheme	Amend Schedule 28 to correctly reflect the intended good management practices.		
PC5LWRP-2652	Fertiliser Association of	Amend to include an alternative fertiliser proxy.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand			
PC5LWRP-2536A	Irrigation New Zealand Inc	Amend Irrigation and Water Use modelling proxies to: Develop a new 80% irrigation application efficiency modelling rule. Of the 95% of each irrigation application that makes it to the soil (this accounts for 5% delivery system and evaporative losses), 20% is lost to drainage and 80% available for plant use. Refine the current irrigation modelling rule so it truly reflects a travelling irrigator scenario.		
PC5LWRP-2552	Federated Farmers of New Zealand	Amend Schedule 28 as requested by Irrigation New Zealand.		
PC5LWRP-1983	Hillcrest Farm	Amend Good Management Practices to ensure the proxies are transparent and amend to clarify the effects of proxies on OVERSEER® files.		
PC5LWRP-1984	Lissington S, L, B and J	Amend Good Management Practices to ensure the proxies are transparent and amend to clarify the effects of proxies on OVERSEER® files.		
PC5LWRP-1985	Neill S	Amend Good Management Practices to ensure the proxies are transparent and amend to clarify the effects of proxies for transparency for analysing the on farm management options.		
PC5LWRP-1986	Auchenbrae Farm Limited	Amend the [modelling] the proxies to ensure they are transparent in order to make good management decisions to ensure the [nitrogen] loss rates are in line with GMP.		
PC5LWRP-1981	Amuri Dairying Ltd	Amend the [modelling] proxies to ensure they are transparent in order to make good management decisions to ensure the [nitrogen] loss rates are in line with GMP.		
PC5LWRP-2287	Nutrient Solutions Ltd	Amend Schedule 28 to provide for a review of the modelling proxies.		
PC5LWRP-774	Rangitata Dairies	Amend Schedule 28 to populate with modelling assumptions once any issues have been resolved.		
PC5LWRP-918	Orari Catchment Group	Amend Schedule 28 to be populated with modelling assumptions once any issues have been resolved.		
PC5LWRP-612	The Wolds Station Ltd	Amend Schedule 28 to ensure border dyke irrigation is not required to meet spray irrigation efficiencies.		
PC5LWRP-1601	Fertiliser Association of New Zealand	Amend Schedule 28 to develop a 'work around' for the fertiliser modelling rule, or alternative pathway. AND Provide an alternative pathway for those farms which cannot be addressed by the Farm Portal.	Accept in part	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice. However, with respect to that part of the submission that requests an alternative to the Farm Portal we have recommended amendments to Plan Change 5 that provide for these circumstances.
PC5LWRP-1077	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Schedule 28 to avoid good management practice becoming a "Sinking lid" when in the future what is defined as good management practices changes.	Reject	Other amendments we have recommended to policies and rules in Plan Change 5 address the matter of the 'sinking lid' in Plan Change 5.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1307	Chisnall W G S	Amend Schedule 28 to achieve removal of the requirement to use OVERSEER® nutrient budgets and replace with a catchment board model that has voluntary farm plans.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1540	Horticulture New Zealand	Amend PC5 to include farm systems that cannot be adequately represented through OVERSEER® and the Farm Portal: • For horticultural systems with greater than 80% in intensive vegetable rotation, apply the MGM proxy for the farm type, and overlay farm soil and climate data to ascertain the leaching number for the property; • For other rotational systems, develop representative rotations using OVERSEER® in conjunction with experts and growers to ascertain the leaching number for the property.	Accept in part	In response to this and other submissions we have recommended amendments to Plan Change 5 that allow, in limited circumstances, an alternative to the Farm Portal for estimating Baseline GMP Loss Rates and Good Management Practice Loss Rates.
PC5LWRP-2552A	Federated Farmers of New Zealand	Reassess the input proxies collectively to ascertain the extent of errors or variances across farm types.	Accept in part	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
PC5LWRP-964	Amuri Irrigation Co Limited	Amend PC5 on the basis of a further peer review of information as follows: commission an independent peer review of the Farm Portal and the modelling rules in Schedule 28, and make the report available to all submitters; and 1) If the review finds the Farm Portal accords with the modelling rules in Schedule 28; a) amend the Farm Portal and Schedule 28 to ensure that losses required to achieve GMP do not unacceptably constrain farming activity and cause unacceptable social and economic effects; and b) insert timeframes in the plan provisions so there are no unacceptable social and economic consequences to achieve GMP and if necessary to provide for the inclusion of timeframes, make amendments to the definitions of "Baseline GMP Loss Rate" and "Good Management Practice Loss Rate" so the definitions include timeframes for the achievement of GMP. OR 2) If the review finds the Farm Portal does not accord with the modelling rules in Schedule 28, amend and test the Farm Portal to ensure it gives effect to the modelling rules and the rules accurately interpret the narrative GMP, and the GMP losses not unacceptably constrain farming activity and cause unacceptable social and economic effects. 3) If the revised version of the Farm Portal does; a) not cause unacceptable effects, no further amendments are required, or b) cause unacceptable effects, amend as follows in (1) above; AND make any similar and/or consequential amendments that stem from the changes and/or additions.		
PC5LWRP-903	Killermont Station 2012 Limited	Amend [Schedule 28] to ensure the MGM narratives used to input rules in OVERSEER® are robust and reflect actual farming systems throughout Canterbury.		
PC5LWRP-972	Rietveld J A	Amend [Schedule 28] to ensure the MGM narratives used to input rules in OVERSEER® are robust and reflect actual farming systems throughout Canterbury.		
PC5LWRP-1106	Twinburn Ltd	Amend [Schedule 28] to ensure the MGM narratives used to input rules in OVERSEER® are robust and reflect actual farming systems throughout Canterbury.		
PC5LWRP-1125	Haldon Station Limited	Amend [Schedule 28] to ensure the MGM narratives used to input rules in OVERSEER® are robust and reflect actual farming systems throughout Canterbury.		
PC5LWRP-853	Kokoamo Farms	Oppose GMP proxies particularly proxies around nitrogen loss and irrigation. The submitter		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited	seeks proxies are quality assured and validated. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-900	Spectrum Group	Oppose GMP proxies particularly proxies around nitrogen loss and irrigation. The submitter seeks proxies are quality assured and validated. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-1154	Cameron W N and S P	Oppose GMP proxies particularly proxies around nitrogen loss and irrigation. The submitter seeks proxies are quality assured and validated. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-1169	Craigmore Farming	Oppose GMP proxies particularly proxies around nitrogen loss and irrigation. The submitter seeks proxies are "QA'ed" and validated.		
PC5LWRP-1170	Keeling Dairies Ltd	Oppose GMP proxies particularly proxies around nitrogen loss and irrigation. The submitter seeks proxies are quality assured and validated. AND Amend Good Management Practice to be about actual on-farm practice and define GMPs that are appropriate for specific catchments in PC5. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-2063	Kakahu Catchment Group	Oppose GMP proxies particularly proxies around nitrogen loss and irrigation. The submitter seeks proxies are "QA'ed" and validated.		
PC5LWRP-857	Orari Water Users Group	Oppose all the GMP [modelling] proxies particularly the proxies around nitrogen loss and irrigation. The submitter seeks proxies are quality assured and validated; AND any related objective, policy or rule that alters as a result of our submission or any other submissions made.		
PC5LWRP-1083	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Include provisions within Schedule 28 to specifically provide for and encourage the use of vegetation, other than grass filter strips to reduce nutrient loss.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
	Twinburn Ltd	GMP should be about actual on-farm practice and incorporated into Farm Environment Plans. GMP practices appropriate for each catchment should be better defined in the plan.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-496	Rangitata Diversion Race Management Limited	Amend 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.		
PC5LWRP-718	Johnston R H M	Clarify GMP proxies, particularly that maintenance fertiliser is to be applied only in the month of October.		

Table s28.3 Target Olsen P Values at Good Management Practice -

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-360	DairyNZ	Delete Method 28.3. OR Should an alternative methodology be required, an N surplus calculation will be tested and prepared for submission as technical evidence.	Reject	A number of submissions sought changes to the good management practice modelling proxies as set out in Schedule 28 of Plan Change 5 and as applied by the Farm Portal. We have considered alternative modelling proxies put forward by submitters, but for the reasons set out in the Section 42A Report and Chapter 9 of this report, we recommend retaining the proxies as notified except that we recommend an amendment to correct an anomaly in the proxy used to model the application of irrigation water under good management practice.
PC5LWRP-443	The Wolds Station Ltd	Amend Table s.28.3 to reduce the Kg of NNonfert from Lucerne to lower than 2000kg. Submitter seeks allowance for the lower performance of Lucerne in dry areas.		

Planning Maps

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1248	McFadden J R	Delete the High Runoff Risk Phosphorus Zones and replace with a catchment board type system that works with landowners to address phosphorus loss.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1503	Beef and Lamb New Zealand Ltd	Delete the Planning Maps High Runoff Risk Phosphorus Zones and replace with an accurate and groundtruthed set of maps, with the inclusion of areas of high risk for the loss of phosphorus to water through leaching and rename the Planning Maps to 'High Risk Phosphorus Zones' to reflect all potential risk pathways for phosphorus loss.	Reject	We are not persuaded that the planning maps are sufficiently inaccurate such that they would be unfit for purpose.
PC5LWRP-1224	Claremont Farms Ltd	Delete the inaccurately mapped phosphorus zones.		
PC5LWRP-1490	Hurunui SNA Group & Rural Advocacy	Delete the High Runoff Risk Phosphorus zones.	Reject	The omission requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. Furthermore, we are not persuaded that the planning maps are sufficiently inaccurate such that they would be unfit for purpose.
PC5LWRP-1684	Maungatahi Farm Limited	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		
PC5LWRP-2047	Murchison JG and LM	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		
PC5LWRP-2227	Sloss K	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		
PC5LWRP-2278	Hoban J K W	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones. Submitter also requests that if any action identified above GMP is required for managing sediment or P loss in a particular area this should be identified and provided for in catchment planning processes in the sub-regional sections.		
PC5LWRP-2414	Rangatahi Downs Land Trust	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		
PC5LWRP-2419	McLean G and M	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		
PC5LWRP-2475	Forrester K	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2597	Munro A R and K H	Delete replacement map series which relate to showing High Risk Runoff and Phosphorus Zones.		
PC5LWRP-2504	Forrester J and R	Delete replacement map series as it relates to showing High Risk Runoff and Phosphorus Zones. Submitter also requests that if any action identified above.		
PC5LWRP-2510	Holland D G	Delete High Runoff Risk Phosphorus Zones in Planning Maps.		
PC5LWRP-2534	Anderson D & K and Anderson B & M	Delete High Runoff Risk Phosphorus Zones in Planning Maps.		
PC5LWRP-1309	Chisnall W G S	Delete all High Runoff Risk Phosphorus Zones.		
PC5LWRP-947A	Amuri Irrigation Co Limited	Delete the planning maps that apply to the same area as the Hurunui and Waiau River Regional Plan; AND make any similar and/or consequential amendments that stem from the changes and/or additions.	Reject	Provisions in the LWRP already address this matter. See Section 2.8 of the LWRP.
PC5LWRP-947	Amuri Irrigation Co Limited	Amend the planning maps to clarify that the 'High Runoff Risk Phosphorus Zone' does not apply in the area covered by the Hurunui and Waiau River Regional Plan.		
PC5LWRP-1849	Forest and Bird NZ	Amend planning maps to improve clarity of maps so various locations are easy to identify.	Reject	We are not persuaded that the planning maps are sufficiently inaccurate such that they would be unfit for purpose.
PC5LWRP-2279	Canterbury/West Coast & South Canterbury/North Otago Branches NZ Deer Farmers Association	Amend Planning Maps to exclude Phosphorus Risk Zones until such time that these zones are credibly verified for on farm planning purposes.		

Map B-031

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-937	Mulcock C J	Delete the High Runoff Risk Phosphorus Zone from the submitter's property.	Reject	We are not persuaded that the planning map is sufficiently inaccurate such that it would be unfit for purpose.

Map B-037

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1287	Stackhouse Farm	Delete the High Run-off Risk Phosphorus Zone pertaining to the area encompassing Limestone Creek [as marked on map supplied with submission].	Reject	We are not persuaded that the planning map is sufficiently inaccurate such that it would be unfit for purpose.

Section 15
General Submissions

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1187	Waikakahi Farmers Group	Amend to enable further investigation actual catchment numbers so as to determine the economic impacts of meeting 90% GMP limits, particularly the effect on long term viability.	Accept in part	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-1691	Phillips N and S	Amend rules and policies to achieve further expansion of the rule and policy framework for the Hakataramea river, hill and flat zones to ensure higher nitrogen emitters (on a per hectare basis) are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-487	Ellis R	Amend Plan Change 5 - Part B Waitaki Amendments if necessary to include the latest flow data and climate change evidence to ensure the calculations and assurances inherent in the plan change can be met, without environmental degradation.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-2341A	Federated Farmers	Provide a land use flexibility cap allowing N discharge of up to 10 kg/ha/year as a permitted activity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.
PC5LWRP-1434	Glentanner Station Limited	Amend PC5 to provide an exemption for farming activities associated with the implementation or exercise of irrigation water permits (that were not granted or commenced before 13 February 2016) from compliance with the land use rules for nutrient management proposed in Part B of PC5.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1449	Mackenzie Irrigation Company Ltd	Amend Part B to include a supporting rule framework for policies and tables that set out local stream and water quality limits AND ensure that current consents trigger levels are consistent with PC5.	Reject	Provisions in Part B of Plan Change 5 already address these matters.
PC5LWRP-840	Waitaki Irrigators Collective Ltd	Submitter highlights concern that the proposed rule framework will lead to overwhelming compliance and enforcement burdens and may not lead to improved water quality outcomes. The submitter states that PC5 doesn't reflect the recommendations made by the Zone Committee in the Lower Waitaki Zone Implementation Programme Addendum and is overly complex and unwieldly.	Reject	See Chapter 16 of this report.
PC5LWRP-842	Waitaki Irrigators Collective Ltd	Submitter highlights concern that the proposed rule framework will lead to overwhelming compliance and enforcement burdens and may not lead to improved water quality outcomes. The submitter states that PC5 doesn't reflect the recommendations made by the Zone Committee in the Lower Waitaki Zone Implementation Programme Addendum and is overly complex and unwieldly.		
PC5LWRP-1737	Lower Waitaki River Management Society Inc	Submitter highlights concern for the manner in which community values have been determined and requests that before any community values for Freshwater Management Units are locked in: i) There must be a genuine community consultation (including surveys) to confirm the 'value' outcomes of the wider community wish to see for the waterways. ii) That the values reflected in the Lower Waitaki River Management Society Strategic Plan be given pre-eminence where values have been determined largely by specific interest groups.		

Submissions relating to provisions in Section 15A of the Plan (South Coastal Canterbury)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1319	Canterbury District Health Board	Retain Part B Section 15A as notified except where specific amendments are sought.	Reject	Section 15A of PC5 is outside the scope of Plan Change 5. For our reasons in respect of scope see the separate narrative on this issue in the main text of this report (Chapter 7).
PC5LWRP-1320	Canterbury District Health Board	Amend Part B Section 15A to include a staged approach with sufficient monitoring to ensure stream nutrient levels remain within those set by the plan.		
PC5LWRP-1200	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Rule 15.5.11 of Section 15A [Plan Change 3] as follows: 15.5.11 The discharge of nutrients onto or into land within the command area of an Irrigation Scheme in circumstances which may result in contaminants entering water and where the property is supplied with water by an irrigation scheme is a permitted~~discretionary~~ activity provided the following conditions are met: 1. The nitrogen load limits in Table 15(p) are not exceeded; and ~~2. The application for resource consent does not include any land that is part of a Nutrient User Group or Farming Enterprise.~~		
PC5LWRP-1200A	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Rule 15.5.12 of Section 15A [Plan Change 3] as follows: 15.5.12 The discharge of nutrients onto or into land within the command area of an Irrigation Scheme in circumstances which may result in contaminants directly entering water and where the property is supplied with water by an irrigation scheme that does not met any of the conditions of Rule 15.5.11 is a non-complying~~prohibited~~ activity.		
PC5LWRP-1321	Canterbury District Health Board	Amend Section 15A Table 15(a) to include values for cyanobacteria mat cover at 20% for rivers that are used for drinking water, important recreational sites and mahinga kai gathering sites.		
PC5LWRP-1322	Canterbury District Health Board	Amend Section 15A Table 15(b) to include revised *E.coli* levels in the table so they do not exceed Microbial Assessment Category D value <550 E.coli per 100 ml within the current suitability for swimming indicator update (2013) of the 'Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas' (2013) where food is gathered for consumption.		
PC5LWRP-1323	Canterbury District Health Board	Amend Section 15A Table 15(e) to include a longer term target of 5.6mg/L nitrate nitrogen annual average concentration in line with the drinking water target for 2040, or a negotiated time soon after, in relation to groundwater water wells used for drinking in Canterbury.		

Section 15B Waitaki Sub-region

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-869	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain the PC5 provisions as notified in Part B, subject to amendments requested by Te Rūnanga o Ngāi Tahu.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-316A	DairyNZ	Amend PC5 to ensure that where a consent is required consideration is given to the application about the errors/uncertainties associated with the DIN numbers.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1751	Lower Waitaki River Management Soc Inc	Submitter opposes plan if absolute limits and targets are not designed to consistently maintain biodiversity and ecosystem services. Submitter requests that the limits that are proposed must be achieved and sustained through practices that stay below or are better than the limits set.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1268A	Haldon Station Limited	Ensure the provisions in Part B of Plan Change 5 reflect the agreement reached between all parties that the Haldon Arm nitrogen headroom is allocated only to dry-land areas of farms.	Accept in part	In response to this submission point we recommend amendments to the provisions in Part B of PC5 to ensure the Upper Waitaki Nitrogen Headroom is allocated only to those parts of a property that are not irrigated.

Section 15B Introduction

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1850	Forest and Bird NZ	Amend the introduction to remove reference to the Mackenzie Agreement and the introduction to recognise the significance and vulnerability of the high natural values.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1491	Director General of Conservation	Amend Section 15B Introduction [p.4-1] para 1 as follows: The boundary of the Waitaki Sub-region begins at the main divide, near Aoraki/Mt Cook and the Southern Alps/Kā Tiritiri o te Moana and encompasses a network of glacial lakes and alpine rivers that flow into the lakes of the Mackenzie and Ahuriri basins.	Accept	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1491A	Director General of Conservation	Amend Section 15B Introduction [p.4-1] to include reference to Mackenzie Country Trust as follows: One of the objectives of the Mackenzie Country Trust is to develop strategic and collaborative approach to the management of the Mackenzie Country that balances agricultural land use with conservation, environmental protection, public use, outdoor recreation and landscape protection across all tenures.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1491B	Director General of Conservation	Amend Section 15B Introduction [p.4-1] para 2 as follows: The Haldon sub-catchment includes the major glacial lakes Ōhau, Pūkaki and Tekapo/Takapo and the water that flows through rivers, streams and canals into the Haldon Arm of Lake Benmore/Te Ao Mārama. This includes smaller lakes such as Middleton, Alexandra, MacGregor and Middleton. The shallow lakes are particularly susceptible to nutrient enrichment from agricultural intensification. The Waitaki Hydro-Electric Power scheme created a number of lakes in the basin such as Lake Ruataniwha, Lake Poaka and Lake Wardell. Lake Ruataniwha is particularly popular for recreation including rowing and recreational boating.	Accept in part	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1491C	Director General of Conservation	Amend Section 15B Introduction [p.4-2] para 1 as follows: The Waitaki Sub-region includes the iconic Mackenzie Basin, an area recognised as nationally significant for its diverse range of range of dryland and aquatic ecosystems, which provide habitat to a large number of indigenous fish and birds. The Waitaki Catchment contains many very rare species. Examples are the black stilt (world's rarest wading bird), black-billed gull, Canterbury Knobbled Weevil (all ranked as Nationally Critical) and the Robust Grasshopper (Nationally Endangered). The Lowland and Upland longjawed Galaxias and Bignose Galaxias are threatened and the Alpine Galaxias are at risk, naturally uncommon threatened status. The black stilt only breeds in the upper Waitaki Catchment, and as far as known, the Waitaki catchment is the only place in the world where the Canterbury Knobbled Weevil and Robust Grasshopper are found. Likewise there are a number of indigenous plant species associated with lake edges and glacial kettle-holes that are endemic to the Mackenzie basin (Nicholas Head, pers. comm.). The Mackenzie Basin in fact, has a high rate of endemism (species evolved there and only found in that location: e.g. White 2002; Warren Chinn pers. comm.).	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		The nationally and internationally significant recreational values of the Waitaki River catchment are well documented, particularly for activities such as angling, boating, swimming, and camping. DOC recognises the recreational values in the Waitaki catchment in documents such as 'Proposed Canterbury Conservation Management Strategy (In prep.). This contains a number of policies and statutory outcomes relating to protecting and creating recreational opportunities in the Waitaki catchment, especially with respect to recreational fishing, camping, access and 'Iconic' and 'Gateway' destinations. All of these involve the catchment's waterways. The Aoraki/Mt Cook National Park Management Plan (DOC 2004) makes reference to the recreational values of rivers in the national park, especially for sight-seeing and tramping. The 'Recreation Strategy for the Canterbury Conservancy' (DOC 1994) recognised the need for protecting recreational values and access in the high country lakes, and wilderness values of the Godley River, which were both under threat from development.		
PC5LWRP-1491D	Director General of Conservation	Amend Section 15B Introduction [p.4-4] para 2 as follows: The water in the Waitaki catchment has been used to generate hydroelectricity since 1935. Between 1935 and 1985 the two main glacial lakes (Tekapo/Takapo and Pūkaki ~~and Ōhau~~) were dammed and water levels raised. The level of Lake Ohau is artificially controlled but it has not been raised. And further or alternative relief to like effect to that sought.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-422	The Wolds Station Ltd	Amend the introduction of Section 15B [p.4-4] para 2 as follows: The braided rivers of the Mackenzie Basin were diverted into man-made canals for power generation and irrigation.		
PC5LWRP-144	Hunter Downs Development Company Limited	Amend the Section 15B introductory narrative [p.4-4] para 3 as follows: In the lower Waitaki catchment several large irrigation schemes exist, including the Morven Glenavy Irrigation Scheme which supplies irrigation water to the majority of land owners in the Northern Fan Area, and the proposed Waihao Downs Irrigation Scheme which has resource consent to irrigate land within the catchment. Infrastructure to supply water via the Waihao Downs Irrigation Scheme is currently in the process of being built, and once completed the scheme will commence supplying water to shareholders. The Hunter Downs Irrigation Scheme is also consented and will take water from the lower Waitaki River for use out of catchment in the South Coastal Canterbury Area.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-776	Waitaki Irrigators Collective Ltd	Amend the description of irrigation in the Lower Waitaki in the Section 15B introduction [p.4-4] as follows: There are several irrigation schemes in the lower Waitaki catchment. The Morven, Glenavy, Ikawai Irrigation Company is a large scheme which supplies water to the majority of landowners in the Northern Fan Management Unit. This includes the Waihao Downs Irrigation Scheme which is has a resource consent to irrigate land within the catchment and is in the process of being built. The Haka Valley Irrigation company delivers water from the Waitaki River to approximately 1,200 hectares of land in the Hakataramea Valley. On the south side of the Waitaki River, the Kurow-Duntroon Irrigation Company (which takes water from Lake Waitaki) and the Maerewhenua District Water Resource Company (which takes water from the Lower Waitaki River) irrigate several thousand hectares within Canterbury. The Lower Waitaki Irrigation Scheme and the North Otago Irrigation Company are large schemes which also take water from Lower Waitaki River, but use that water to irrigate land within the Otago Region. There are also numerous independent irrigators on both the North and south sides of the Waitaki River who have their own consents to irrigate, outside of the irrigation schemes.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-422A	The Wolds Station Ltd	Amend the introduction of Section 15B 4th bullet point as follows: Providing opportunities for the establishment or intensification of farming activities ~~on small blocks of land~~ on extensive properties in order to align with The Mackenzie Agreement.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-423	The Wolds Station Ltd	Amend [p.4-5] bullet 4 as follows: Providing opportunities for the establishment or intensification of farming activities ~~on small blocks of land~~ on extensive properties in order to align with The Mackenzie Agreement		
PC5LWRP-1014	Morven Glenavy Ikawai Irrigation Co Ltd	Amend the description of irrigation in the Lower Waitaki in the Section 15B introduction.	Accept in part	In response to other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Waitaki Freshwater Management Units - Figure 1

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1496	Director General of Conservation	Amend Figure 1 [Waitaki Sub-region Freshwater Management Units map] to include the Haldon and Ahuriri sub catchments. And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

15B.1 Waitaki Sub-region Definitions -

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1539	Director General of Conservation	Retain 15B.1 definitions as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Ahuriri Zone				
PC5LWRP-1855	Forest and Bird NZ	Retain the definition of 'Ahuriri Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Aquaculture				
PC5LWRP-1858	Forest and Bird NZ	Retain the definition of 'Aquaculture' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Aquaculture Nitrogen Loss Modelling				
PC5LWRP-1859	Forest and Bird NZ	Retain the definition of 'Aquaculture Nitrogen Loss Modelling' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Aquaculture Nutrient User Group				
PC5LWRP-1860	Forest and Bird NZ	Retain the definition of 'Aquaculture Nutrient User Group' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
Greater Waikakahi Zone				
PC5LWRP-1861	Forest and Bird NZ	Retain the definition of 'Greater Waikakahi Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Hakataramea Flat Zone				
PC5LWRP-1862	Forest and Bird NZ	Retain the definition of 'Hakataramea Flat Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Hakataramea River Zone				
PC5LWRP-1865	Forest and Bird NZ	Retain the definition of 'Hakataramea River Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Hakataramea Hill Zone				
PC5LWRP-1866	Forest and Bird NZ	Retain the definition of 'Hakataramea Hill Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Haldon Zone				
PC5LWRP-1867	Forest and Bird NZ	Retain the definition of 'Haldon Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Mid Catchment Zone				
PC5LWRP-1868	Forest and Bird NZ	Retain the definition of 'Mid Catchment Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Northern Fan Freshwater Management Unit				
PC5LWRP-1869	Forest and Bird NZ	Retain the definition of 'Northern Fan Freshwater Management Unit' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Nutrient User Group				
PC5LWRP-1871	Forest and Bird NZ	Retain the definition of 'Nutrient User Group' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
PC5LWRP-396	DairyNZ	Amend definition 'Nutrient User Group' as follows: means a group of properties in multiple ownership, where the ~~owners of those properties undertake~~ primary purpose of those properties is for farming activities, and which operate as a collective for the purposes of nutrient management. Or words to similar effect.		
Upper Waitaki Freshwater Management Unit				
PC5LWRP-1872	Forest and Bird NZ	Retain the definition of 'Upper Waitaki Freshwater Management Unit' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
Upper Waitaki Hill Zone				
PC5LWRP-1873	Forest and Bird NZ	Retain the definition of 'Upper Waitaki Hill Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Upper Waitaki Nitrogen Headroom				
PC5LWRP-1874	Forest and Bird NZ	Retain the definition of 'Upper Waitaki Nitrogen Headroom' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
PC5LWRP-2066	Ravensdown Limited	Amend the definition for Upper Waitaki Nitrogen Headroom to include a note to the effect that the Nitrogen Headroom needs to be reassessed once the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved. Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-397	DairyNZ	Amend definition of 'Upper Waitaki Nitrogen Headroom' as follows: means within the Haldon Zone or Mid Catchment Zone the maximum nitrogen loss rate (measured in kg/ha/yr) available to a farming activity (inclusive of their Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP) as estimated by Environment Canterbury using the formula set out in Schedule 27. Or words to similar effect.		
Valley and Tributaries Freshwater Management Unit				
PC5LWRP-1875	Forest and Bird NZ	Retain the definition of 'Valley and Tributaries Freshwater Management Unit' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Valley Tributaries Zone				
PC5LWRP-1876	Forest and Bird NZ	Retain the definition of 'Valley and Tributaries Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.
Whitneys Creek Zone				
PC5LWRP-1877	Forest and Bird NZ	Retain the definition of 'Whitneys Creek Zone' as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the definitions are retained as notified.

15B.2 Other Regional Plans and instruments that apply to the Waitaki Sub-region. -

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1878	Forest and Bird NZ	Amend 15B.2.1 to include guidance on how it is intended that these two plans work together by including the following, or similar: In general the provisions of the LWRP Part B – Waitaki sub region apply to discharges associated with Allocation activities controlled under the Waitaki Catchment Water Allocation Regional Plan.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1524	Director General of Conservation	Insert 'other plans and instruments' as follows: 15B.3A Management Plans that Apply to the Waitaki Sub Region • Canterbury Conservation Management Strategy • Aoraki/ Mount Cook National Park Management Plan And further or alternative relief to like effect to that sought.		

15B.4 Policies - General

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1464	Mackenzie Irrigation Company Ltd	The submitter is concerned that 'clawbacks' in the Ahuriri Zone will be required in the future and question why there is no policy or rule relevant to this.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1976	Forest and Bird NZ	Submitter supports the Part B policy approach in general.	Accept	We gratefully acknowledge this support.

Waitaki Sub-region Policies – New Policies

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1274	Twizel Dairy	Insert new policy to manage the control of effects associated with farming activities and aquaculture where they are both active in an area adjacent to a water body- such as Kellands Pond and the Wairepo Arm.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-101	Meridian Energy Limited	Insert new Policy as follows: Within the Waitaki sub-region Freshwater Management Units, when implementing Policies 4.1 and 4.2 recognise that the existing freshwater quality in the lakes and rivers is influenced by naturally occurring processes, including the glacial origin of the water, and natural variation. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2021	Genesis Energy Limited	Insert new Policy as follows: When implementing Policies 4.1 and 4.2 to the Waitaki sub-region Freshwater Management Units, to recognise that the existing freshwater quality in the lakes and rivers is influenced by naturally occurring processes, including the glacial origin of the water, and natural variation. Or words to similar effect.		
PC5LWRP-2658	Director General of Conservation	Insert new Policy as follows: Significant indigenous freshwater biodiversity and habitat is maintained in the four freshwater management units by: (a) The implementation of a regional plan change to the Canterbury Land and Water Regional Plan notified after 13 February 2016 that require the identification and protection of significant freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-877	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Insert new policy (15.4.3A) as follows: Mahinga kai enhancement is achieved in the Waitaki Sub-region by: (a) Permitting nutrient losses where they are associated with the take of water for mahinga kai enhancement; and (b) Where aquaculture is undertaken for mahinga kai enhancement an Aquaculture Environment Plan sets out the actions that will be implemented to minimise nutrient loss.		
PC5LWRP-877A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Insert new policy (15B.4.xx) as follows: Where, as at 13 February 2016, a properties nitrogen loss is greater than 15kgs per hectare per year 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: (i) 15% by 1 January 2025 (ii) 25% by 1 January 2030 (iii) 35% by 1 January 2035	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 10 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		provided that these nitrogen loss reductions do not require the property's nitrogen loss calculation to reduce below the permitted nitrogen baseline..		
PC5LWRP-101A	Meridian Energy Limited	Insert new Policy after Policy 15B.4.5 as follows: 15B.4.5A Management of freshwater quality in the Waitaki Sub-region identifies and provides for the national value of the existing hydro-electricity generation from the Waitaki Power Scheme, including as provided for in Policy 4.51. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2021A	Genesis Energy Limited	Insert new Policy after Policy 15B.4.5 as follows: 15B.4.5A Management of freshwater quality in the Waitaki Sub-region identifies and provides for the national value of the existing hydro-electricity generation from the Waitaki Power Scheme, including as provided for in Policy 4.51. Or words to similar effect.		
PC5LWRP-1521	Mackenzie Irrigation Company Ltd	Insert new policy to link catchment loads for the Ahuriri Zone in Table 15B(f) in order to manage and enforce catchment loads		

Policy 15B.4.1

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-309	DairyNZ	Retain Policy 15B.4.1 as notified.	Accept in part	In response to other submissions we are recommending amendments to the notified provisions but retaining the general intent of the policy.
PC5LWRP-1541	Director General of Conservation	Retain Policy 15B.4.1 as notified.		
PC5LWRP-871	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Policy 15B.4.1 as follows: Land use practices are managed so that ~~F~~ freshwater quality in the Waitaki Sub-region is ~~managed to~~ supports the exercise of kaitiakitanga ~~customary uses and~~ to achieve the tangata whenua freshwater outcomes described in Tables 15B(a) and 15B(b).	Accept in part	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Policy 15B.4.2

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-874	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain Policy 15B.4.2 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2678	Director General of Conservation	Retain Policy 15B.4.2 as notified.		
PC5LWRP-2119	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.2 to specify the particular IMP that are to be had regard to in terms of section 66(2A) of the Act. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2070	Ravensdown Limited	Amend Policy 15B.4.2 as follows: "Protect wāhi tapu and wāhi taonga values in the Waitaki Sub-region by avoiding or mitigating the adverse effects of land and water use ~~intensification~~ on wāhi tapu or wāhi taonga identified		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		in an iwi management plan." Or such other or alternative wording which would properly address the concerns raised.		
PC5LWRP-398	DairyNZ	Amend Policy 15B.4.2 as follows: ~~Protect~~Provide for wāhi tapu and wāhi taonga values in the Waitaki Sub-region by avoiding , managing or mitigating the adverse effects of land use intensification on wāhi tapu or wāhi taonga identified in an iwi management plan. Or words to similar effect.		

Policy 15B.4.3

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2680	Director General of Conservation	Retain Policy 15B.4.3 as notified.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1326	Canterbury District Health Board	Retain Policy 15B.4.3 as notified.		
PC5LWRP-873	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Policy 15B.4.3 as follows: ~~Have regard to~~Provide for mahinga kai values for all lakes, river, wetlands and springs in the Waitaki Sub-region when considering applications for resource consent to use land for all farming activity including the actions and timeframes described in the Farm Environment Plan.		

Policy 15B.4.4

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-717	Central South Island Fish and Game Council	Retain Policy 15B.4.4 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1542	Director General of Conservation	Retain Policy 15B.4.4 as notified.		
PC5LWRP-2122	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.4 as follows: Surface water flows are maintained in Whitney's Creek by avoiding the transfer of any part of a surface water take from Whitney's Creek where that transfer would result in an increase in take from Whitney's Creek , and avoiding future additional allocation of surface water upstream of map reference CB19:5410-2531. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-399	DairyNZ	Amend Policy 15B.4.4 as follows: Surface water flows are maintained in Whitneys Creek by avoiding the transfer of any part of a surface water take from Whitneys Creek where that transfer will result in a net decrease in surface water flows, and avoiding additional future allocation of surface water upstream of map reference CB19:5410-2531. Or words to similar effect.		

Policy 15B.4.5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1546	Director General of Conservation	Retain Policy 15B.4.5 as notified.	Accept	We agree that retaining this policy is appropriate.
PC5LWRP-1879	Forest and Bird NZ	Retain Policy 15B.4.5 as notified.		

Policy 15B.4.6

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1548	Director General of Conservation	Retain Policy 15B.4.6 as notified.	Accept	We agree that retaining this policy is appropriate.
PC5LWRP-1881	Forest and Bird NZ	Amend Policy 15B.4.6 to apply region wide.	Reject	We are not convinced that a region-wide reference to the Whitneys Creek Zone is appropriate.

Policy 15B.4.7

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1549	Director General of Conservation	Retain Policy 15B.4.7 as notified.	Accept	We agree that retaining the policy is appropriate.
PC5LWRP-1882	Forest and Bird NZ	Retain Policy 15B.4.7 as notified.		

Policy 15B.4.8

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-719	Central South Island Fish and Game Council	Retain Policy 15B.4.8 as notified.	Accept in part	We are recommending reformatting and merging elements of the policies for aquaculture for clarity. Except to that extent that we are recommending these amendments the policy is generally retained as notified.
PC5LWRP-904	Mt Cook Alpine Salmon Ltd	Retain Policy 15B.4.8 as notified.		
PC5LWRP-1557	Director General of Conservation	Retain Policy 15B.4.8 as notified.		
PC5LWRP-1883	Forest and Bird NZ	Retain Policy 15B.4.8 as notified.		

Policy 15B.4.9

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2682	Director General of Conservation	Retain Policy 15B.4.9 as notified.	Accept	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the policy is retained as notified.
PC5LWRP-905	Mt Cook Alpine Salmon Ltd	Retain Policy 15B.4.9 as notified.		
PC5LWRP-1884	Forest and Bird NZ	Amend Policy 15B.4.9 to include an additional clause providing for review of consent in certain circumstances.	Accept in part	In response to this submission we recommend amendments to Policy 15B.4.8 to enable a resource consents to be reviewed in

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				circumstances where the water quality limits in the plan are exceeded.

Policies - Nutrient Management General

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2664	Hurst M J F	Amend the Waitaki Sub-region Policies for Nutrient Management to achieve removal of the requirement for farms to operate at 10% below GMP by 2020.	Accept in part	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.

Policy 15B.4.10 (now recommended Policy 15B.4.11)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1558	Director General of Conservation	Retain Policy 15B.4.10 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-492	Campbell A	Amend Policy 15B.4.10 to achieve all farming activities to be managed to ensure water quality limits and freshwater outcomes and all farming activities causing or contributing to degrading ecological health of freshwater habitats required to reduce contaminant discharges immediately.	Accept in part	Provisions in Plan Change 5 already address these matters.
PC5LWRP-720	Central South Island Fish and Game Council	Amend Policy 15B.4.10 to include: all farming activities will be managed to ensure that water quality limits and freshwater outcomes will be met	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2073	Ravensdown Limited	Amend Policy 15B.4.10(a) as follows: "(a) all farming activities ~~minimising~~managing nutrient losses through implementation of good practice; and ..." Or such other or alternative wording which would properly address the concerns raised.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1602	Fertiliser Association of New Zealand	Amend Policy 15B.4.10 (a) as follows: All farming activities ~~minimising~~managing nutrient losses through implementation of good practice.		
PC5LWRP-2327	Federated Farmers of New Zealand	Delete Policy 15B.4.10(b).	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2327A	Federated Farmers of New Zealand	Amend Policy 15B.4.10(c) as follows: Farming activities with the potential for more significant losses, greater than 15 kg N/ha/year, being subject to a resource consent process.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.
PC5LWRP-400	DairyNZ	Amend Policy 15B.4.10 (c) as follows: (c) the risks associated with farming activities with the potential for ~~more~~ significant nutrient losses will be~~ing subject to~~ through a resource consent process. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2131	Fonterra Co-operative	Amend Policy 15B.4.10 (c) as follows:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Group Ltd	(c) farming activities with the potential for ~~more~~ significant nutrient losses being subject to a resource consent. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-720A	Central South Island Fish and Game Council	Amend Policy 15B.4.10(c) as follows: c) farming activities ~~with the potential for more significant nutrient losses being subject to~~ causing or contributing to degraded ecological health of freshwater habitats and exceedance of water quality limits will be managed through a resource consent process, and will be required to reduce contaminant discharges overtime to achieve water quality limits and freshwater outcomes .		
PC5LWRP-1885	Forest and Bird NZ	Amend Policy 15B.4.10(c) as follows: (c) Farming activities with the potential for more significant nutrient losses being subject to a resource consent process which will be subject to conditions that ensure that the water quality limits in 15.7 are achieved .	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Policy 15B.4.11 (now recommended Policy 15B.4.12)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1560	Director General of Conservation	Retain Policy 15B.4.11 as notified.	Accept	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the policy is retained as notified.
PC5LWRP-1328	Canterbury District Health Board	Retain Policy 15B.4.11 as notified.		
PC5LWRP-1603	Fertiliser Association of New Zealand	Retain Policy 15B.4.11 as notified.		
PC5LWRP-1886	Forest and Bird NZ	Retain Policy 15B.4.11 as notified.		
PC5LWRP-2328	Federated Farmers of New Zealand	Retain Policy 15B.4.11 as notified.		
PC5LWRP-2078	Ravensdown Limited	Retain Policy 15B.4.11 as notified		
PC5LWRP-778	Waitaki Irrigators Collective Ltd	Amend Policy 15B.4.11(a) to correct typographical error as follows: ...the specific on-farm~~on-arm~~ actions that will...	Accept	In response to this and other submissions we recommend an amendment to correct typographical errors.
PC5LWRP-1015	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Policy 15B.4.11(a) to correct typographical error as follows: ...the specific on-farm~~on-arm~~ actions that will...		
PC5LWRP-401	DairyNZ	Amend Policy 15B.4.11(a) as follows: (a) describe the specific on-farm actions that will be undertaken (and the timeframe within which these actions will be undertaken) to implement the Good Management Practices; Or words to similar effect.		

Policy 15B.4.12 (now recommended Policy 15B.4.13)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1561	Director General of Conservation	Retain Policy 15B.4.12 as notified.	Accept	We agree that retaining this policy is appropriate.
PC5LWRP-747	Central South Island Fish and Game Council	Retain Policy 15B.4.12.		
PC5LWRP-1604	Fertiliser Association of New Zealand	Retain Policy 15B.4.12 as notified.		
PC5LWRP-1887	Forest and Bird NZ	Retain Policy 15B.4.12 as notified.		
PC5LWRP-2080	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Retain Policy 15B.4.12 as notified.	Accept in part	
PC5LWRP-402	DairyNZ	Delete Policy 15B.4.12. AND Insert a new policy which provides for an adaptive management approach, with a focus on good management practice and linking these practices with agreed environmental indicators.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments. With respect to the request to include a new policy which 'provides for an adaptive management approach' we consider this to be a general request which does not give precise details of amendments requested.
PC5LWRP-2330	Federated Farmers of New Zealand	Amend to replace Policy 15B.4.12 with an adaptive management approach, focusing on good management practice and linking this with environmental indicators.	Reject	The replacement of this policy with the alternative requested would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2137	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.12 to use a term [for on-land nitrogen limits] consistent with terminology used elsewhere in the Land and Water Regional Plan; OR Amend to define the term "on-land nitrogen limits"; AND Make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	A general request which does not give precise details of amendments requested.

Policy 15B.4.13 (now recommended Policy 15B.4.24)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1562	Director General of Conservation	Retain Policy 15B.4.13 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are substantially retained.
PC5LWRP-1615	Fertiliser Association of New Zealand	Retain Policy 15B.4.13 but provide for uncertainty in GMP loss rates and an alternative pathway for GMP N loss values, and any consequential changes.	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				accordingly. See also Chapter 9 of this report.
PC5LWRP-2332	Federated Farmers of New Zealand	Retain Policy 15B.4.13 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are substantially retained.
PC5LWRP-2788	Pukaki Tourism Holdings LP	Amend to allow the lawful exceedance of the nitrogen baseline to occur after the 13 February 2016 in special circumstances i.e. the control of invasive pest species such as wilding pine.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-748	Central South Island Fish and Game Council	Amend Policy 15B.4.13 to include: (c) the exceedance will not result in the water quality limits in Tables 15B (c), (d), and (e) being exceeded.	Reject	
PC5LWRP-2083	Ravensdown Limited	Amend Policy 15B.4.13 to: a) Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; b) Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; c) Provide an additional formal process for reviewing and moderating inaccurate portal results; d) Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; OR such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-493	Campbell A	Amend Policy 15B.4.13 to ensure no exceedance of the nitrogen baseline and to ensure no exceedance of water quality limits as outlined in Table 15B(c), Table 15B(d) and Table 15B(e).	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1888	Forest and Bird NZ	Amend Policy 15B.4.13 to clarify that the grant of consent will be limited to the lawful exceedance that existed at 13 February 2016.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-403	DairyNZ	Amend Policy 15B.4.13(b) as follows: (b) the nitrogen loss calculation remains below the lesser of the Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice or below the highest annual nitrogen loss that occurred in the four years prior to 13 February 2016. Or words to similar effect.	Reject	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In regard to the remainder of the request the amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1166	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.13(b) as follows: ~~(b)~~ The nitrogen loss calculation remains below the lesser of the Good Management Practices Loss rate or the Loss Rate Assessed as Good Management Practice (whichever is applicable)~~or the nitrogen loss that occurred in the four years prior to 13 February 2016.~~ AND	Reject	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		accordingly. See also Chapter 9 of this report.
PC5LWRP-1166A	Fonterra Co-operative Group Ltd	Insert new Policy 15B.4.13(c): (c) Policy 15B.4.14 or Policy 15B.4.15 apply. AND Make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Policy 15B.4.14

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1563	Director General of Conservation	Retain Policy 15B.4.14 as notified.	Reject	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c).
PC5LWRP-1893	Forest and Bird NZ	Retain Policy 15B.4.14.		
PC5LWRP-2334	Federated Farmers of New Zealand	Retain Policy 15B.4.14 as notified.		
PC5LWRP-1617	Fertiliser Association of New Zealand	Retain Policy 15B.4.14 but provide for uncertainty in GMP loss rates and an alternative pathway for GMP N loss values, and any consequential changes.	Accept in part	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c). In regard to the rest of the submission requesting provision in Plan Change 5 for an alternative pathway to the Farm Portal for estimating nutrient losses under good management practice, we agree that, in limited circumstances, an alternative pathway is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-426	The Wolds Station Ltd	Clarify what evidence is required to justify that the nitrogen baseline has been lawfully exceeded. Submitter seeks the inclusion of a definition.	Reject	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c).
PC5LWRP-2086	Ravensdown Limited	Amend Policy 15B.4.14 to: a) Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; b) Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; c) Provide an additional formal process for reviewing and moderating inaccurate portal results; d) Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	In response to other submissions we are recommending the omission of this policy. However we note that this submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1167	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.14(b) as follows: The nitrogen losses from the farming activity remain below the Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice for the farming activity proposed at the time the water permit was granted. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-404	DairyNZ	Amend Policy 15B.4.14(b) as follows: (b) the nitrogen losses from the farming activity remain below the Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice for the farming activity proposed at the time the water permit was granted. Or words to similar effect.		

Policy 15B.4.15

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1564	Director General of Conservation	Retain Policy 15B.4.15 as notified.	Reject	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c).
PC5LWRP-1618	Fertiliser Association of New Zealand	Retain Policy 15B.4.15 but provide for uncertainty in GMP loss rates and an alternative pathway for GMP N loss values, and any consequential changes.	Accept in part	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c). In regard to the rest of the submission requesting provision in Plan Change 5 for an alternative pathway to the Farm Portal for estimating nutrient losses under good management practice, we agree that, in limited circumstances, an alternative pathway is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2335	Federated Farmers of New Zealand	Retain Policy 15B.4.15 as notified.	Reject	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c).
PC5LWRP-2088	Ravensdown Limited	Amend Policy 15B.4.15 to: a) Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; b) Provide an alternative pathway in addition to that provided by the portal, and for farms that	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		cannot be modelled; c) Provide an additional formal process for reviewing and moderating inaccurate portal results; d) Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.		and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1894	Forest and Bird NZ	Amend Policy 15B.4.15(a) as follows: (a) the application contains evidence that demonstrates that the nitrogen baseline has been lawfully exceeded and the ~~increased~~ portion of exceeded nitrogen loss is the result of irrigation or winter grazing that has been undertaken as a permitted activity; and…	Reject	In response to other submissions we are recommending, despite this submission, that the policy be omitted, for the reasons in those other original submission and advanced in the evidence and legal submissions in support of those original submissions. We note that the matters addressed in this policy would be the subject of recommended new Rule 15B.5.8(c).
PC5LWRP-1171	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.15 (b) to read: The farming activity will be managed so that the nitrogen loss calculation remains below the Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-405	DairyNZ	Amend Policy 15B.4.15 (b) as follows: (b) the farming activity will be managed so that the nitrogen loss calculation remains below the Good Management Practice Loss Rate or the Loss Rate Assessed as Good Management Practice. Or words to similar effect.		

Policy 15B.4.16 (now recommended Policy 15B.4.25)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1565	Director General of Conservation	Retain Policy 15B.4.16 as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the policy is retained as notified (with minor improvements to wording).
PC5LWRP-1332	Canterbury District Health Board	Retain Policy 15B.4.16 as notified.		
PC5LWRP-2089	Ravensdown Limited	Delete the 15 year restriction from Policy 15B.4.16.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1895	Forest and Bird NZ	Amend Policy 15B.4.16 to include: Resource consents will include conditions setting out: a) water quality monitoring sites including requirements for visual monitoring if appropriate b) Methods to avoid remedy or mitigate localised other effects	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1619	Fertiliser Association of New Zealand	Amend Policy 15B.4.16 to provide for consents lasting beyond 15 years. OR Delete Policy 15B.4.16.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-60	Meridian Energy	Amend Policy 15B.4.16 as follows:	Reject	We are not persuaded that the amendment requested would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited	Within the Waitaki Sub-region, resource consents granted for the use of land for farming activities and the associated discharge of nutrients are restricted to a term of no more than 15 years and include conditions that enable a review of the resource consent under section 128(1)(a) of the RMA where an exceedance of the outcome or limits in Tables 15B(a), 15B(b) , 15B(c), 15B(d) ,~~and~~ 15B(e) , and 15B(f) is identified. Or words to similar effect.		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1744	Genesis Energy Limited	Amend Policy 15B.4.16 as follows: Within the Waitaki Sub-region, resource consents granted for the use of land for farming activities and the associated discharge of nutrients are restricted to a term of no more than 15 years and include conditions that enable a review of the resource consent under section 128(1)(a) of the RMA where an exceedance of the outcome or limits in Tables 15B(a), 15B(b) , 15B(c), 15B(d) ,~~and~~ 15B(e) , and 15B(f) is identified. Or words to similar effect.		
PC5LWRP-749	Central South Island Fish and Game Council	Amend Policy 15B.4.16 as follows: Within the Waitaki Sub-region, resource consents granted for the use of land for farming activities and the associated discharge of nutrients are restricted to a term of no more than 15 years and include conditions that enable a review of the resource consent under section 128(1)(a) of the RMA where ~~an exceedance of the~~ water quality is declining and the outcomes or limits in Tables 15B(a), 15B(b), 15B(c), 15B(d) and 15B(e) ~~is~~ are at risk of being exceeded and are identified.		
PC5LWRP-406	DairyNZ	Amend Policy 15B.4.16 as follows: Within the Waitaki Sub-region, resource consents for the use of land for farming activities and the associated discharge of nutrients ~~are restricted to terms of no more than 15 years and~~ include conditions that enable a review of the resource consent under section 128(1)(a) of the RMA where an exceedance of the limits in Tables 15B(c), 15B(d) and 15B(e) is identified. Or words to similar effect.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2336	Federated Farmers of New Zealand	Amend Policy 15B.4.16 as follows: Within the Waitaki Sub-region, resource consents for the use of land for farming activities and the associated discharge of nutrients ~~are restricted to terms of no more than 15 years and~~ include conditions that enable a review of the resource consent under section 128(1)(a) of the RMA where an exceedance of the limits in Tables 15B(c), 15B(d) and 15B(e) is identified.		

Policy 15B.4.17 (now recommended Policy 15B.4.14)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1566	Director General of Conservation	Retain Policy 15B.4.17 as notified.	Accept in part	Except for our recommendations to move references to 'Aquaculture Nutrient User Groups' to Policy 15B.4.8, we are recommending to retain the policy as notified.
PC5LWRP-2337	Federated Farmers of New Zealand	Retain Policy 15B.4.17.		
PC5LWRP-310	DairyNZ	Retain Policy 15B.4.17 as notified.		
PC5LWRP-2090	Ravensdown Limited	Retain Policy 15B.4.17 as notified.		
PC5LWRP-1896	Forest and Bird NZ	Delete Policy 15B.4.17.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.

Policy 15B.4.18 (now recommended Policy 15B.4.15)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2339	Federated Farmers of New Zealand	Retain Policy 15B.4.18 as notified. Submitter doesn't support a requirement on irrigation schemes to report and audit constituent farms.	Accept in part	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-2093B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Delete clauses (b)(ii) Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-2093C	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Delete clauses (b)(iii)	Accept	
PC5LWRP-407	DairyNZ	Delete Policy 15B.4.18(b)(iii) Subsequently renumber (b)(v) and amend to be applicable to the Greater Waikaikahi Zone and the Hakataramea River Zone. Or words to similar effect.		
PC5LWRP-2093D	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Delete clause (b)(iv);		
PC5LWRP-407A	DairyNZ	Delete Policy 15B.4.18 (b)(iv). Subsequently renumber (b)(v) and amend to be applicable to the Greater Waikaikahi Zone and the Hakataramea River Zone. Or words to similar effect.		
PC5LWRP-2093	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 15B.4.18 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent. Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1189	Waihuna Dairies Ltd	Amend to require properties in the Greater Waikakahi Zone to be at GMP not 90% of GMP.	Accept	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-1479	Harrison P	Amend Policy 15B.4.18 to achieve permitted activity rules that are more restrictive to poor practice.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1288	Twizel Dairy	Amend Policy 15B.4.18 to recognise irrigation schemes that span zones.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1622	Fertiliser Association of	Amend Policy 15B.4.18(b) to provide a clear direction on the extent to which Irrigation schemes	Accept in part	We are recommending amendments to the policy that

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand	can limit N loss such that their contribution to the catchment load and water quality outcomes is controlled and will ultimately meet catchment limits. AND Amend to provide for uncertainty in GMP loss rates and an alternative pathway for GMP N loss values and any consequential changes.		generally accord with this submission point.
PC5LWRP-1238	Benmore Irrigation Company Ltd - Shepherd B	Amend Policy 15B.4.18 to achieve a correction in wording to recognise irrigation schemes that span zones.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1568	Director General of Conservation	Amend Policy 15B.4.18 as follows: Within the Waitaki subregion, water and freshwater habitat quality is maintained by requiring:…	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-61	Meridian Energy Limited	Amend Policy 15B.4.18(a) as follows: Within the Waitaki Sub-region, water quality is maintained by requiring: (a) notwithstanding (ai) and (b) below, cumulatively with nitrogen losses from all other farming activity in the Zone, the nitrogen loss from properties partially or fully supplied with water from a scheme, will not result in the nitrogen load limits specified in Table 15B(f) for the Ahuriri, Haldon and Mid-Catchment Zones being exceeded; and (a)(i) any application for resource consent for the discharge... Or words to similar effect and any consequential amendments.		
PC5LWRP-1748	Genesis Energy Limited	Amend Policy 15B.4.18(a) as follows: Within the Waitaki Sub-region, water quality is maintained by requiring: (a) notwithstanding (ai) and (b) below, cumulatively with nitrogen losses from all other farming activity in the Zone, the nitrogen loss from properties partially or fully supplied with water from a scheme, will not result in the nitrogen load limits specified in Table 15B(f) for the Ahuriri, Haldon and Mid-Catchment Zones being exceeded; and (a)(i) any application for resource consent for the discharge... Or words to similar effect and any consequential amendments.		
PC5LWRP-2093A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 15B,4,18(b) to provide a clear direction on the extent to which irrigation schemes or principle water suppliers can limit N loss such that their contribution to the catchment load and water quality outcomes is controlled and will ultimately meet catchment limits, rather than presenting the catchment limits and outcomes as the control point; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	We are recommending amendments to the policy that generally accord with this submission point.
PC5LWRP-145	Hunter Downs Development Company Limited	Amend the Policy 15B.4.18(b) as follows: (b) any discharge permit for the discharge of nutrients within the Waitaki Sub-region granted to an irrigation scheme or principal water supplier to be subject to conditions that restrict the total nitrogen loss from properties that are partially or fully supplied with water from a scheme to a limit not exceeding:….	Reject	We are not persuaded that the amendment requested is necessary or appropriate.
PC5LWRP-751	Central South Island Fish and Game Council	Amend Policy 15B.4.18(b)(ii) as follows: (ii) the nitrogen load limit allocated to all farming activities within the Zone that is specified in Table 15B(f) and the local instream and groundwater quality limits set out in Tables 15B(c) and 15B(e) for the Valley and Tributaries Zone or Whitneys Creek Zone;		
PC5LWRP-1183	Waikakahi Farmers Group	Amend Policy 15B.4.18 (b)(iii) to ensure further investigation is completed to assess the difference between modelled ECAN numbers and what is actually occurring now. There has	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		been sufficient headroom created and a reduction to 90% of GMP is not required.		
PC5LWRP-1479B	Harrison P	Amend Policy 15B.4.18 (b)(v) to include protection of the Hakataramea River Zone from existing consents 'rolling over' and GMP losses not being reviewed.	Reject	We consider it is not appropriate to include provisions that would preclude the granting of a replacement consent for an activity where the effects of the activity are appropriately mitigated.
PC5LWRP-1479A	Harrison P	Amend Policy 15B.4.18 (b)(iv) to achieve better protection of the Hakataramea River from cattle grazing fodder beet.	Reject	We are not persuaded that compliance with 90% of the GMP Limit is necessary to achieve the outcomes and limits for the Hakataramea FMU. We are therefore recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-1568A	Director General of Conservation	Insert new Policy 15B.4.18(b) as follows and renumber current paragraph (b) to paragraph (c) accordingly. (b) i. Provision of riparian buffer strips on waterways ii. Native planting where appropriate iii. Fencing of springheads and spring-fed waterways iv. Use of artificial wetlands where appropriate; and And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1897	Forest and Bird NZ	Amend Policy 15B.4.18 to insert condition (c) which provides: any discharge permit granted to an irrigation scheme or principal water supplier will be subject to conditions that avoid remedy or mitigate other adverse effects.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Policy 15B.4.19

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-906	Mt Cook Alpine Salmon Ltd	Retain Policy 15B.4.19 as notified.	Reject	We are recommending omitting this policy and incorporating the substance of the provisions in Policy 15B.4.8 for clarity.
PC5LWRP-1898	Forest and Bird NZ	Retain Policy 15B.4.19 as notified.		
PC5LWRP-1571	Director General of Conservation	Amend Policy 15B.4.19, but amend as follows: Water and habitat quality in the Upper Waitaki Freshwater Management Unit is maintained by:		
PC5LWRP-1172	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.19 to combine the Policies 15B.4.19 and 15B.4.20 [note: submitter incorrectly refers to 15B.4.19] OR Make the distinction between these policies more apparent (by referring to aquaculture and farming activities respectively). AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-1571A	Director General of Conservation	Amend Policy 15B.4.19, by adding a new clause as follows: (a) After 13 February 2016, avoiding adverse effects on threatened native fish habitats; And further or alternative relief to like effect to that sought.		

Policy 15B.4.20 (now recommended Policy 15B.4.16)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1343	Pukaki Tourism Holdings LP	Retain the availability of nitrogen headroom in the Haldon zone catchment.	Accept	We agree that retaining this policy is appropriate.
PC5LWRP-1899	Forest and Bird NZ	Delete Policy 15B.4.20(a).	Reject	The omission of this clause in this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2096	Ravensdown Limited	Amend Policy 15B.4.20 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1623	Fertiliser Association of New Zealand	Amend Policy 15B.4.20 to remove the word "avoiding" and provide for discretion when granting resource consent based on GMP Loss rates and provide for an alternative pathway for farm systems that cannot be addressed with the Farm Portal and any consequential changes.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In regard to the rest of the submission we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2341	Federated Farmers of New Zealand	Amend Policy 15B.4.20 to provide a degree of flexibility to farming activities in the Ahuriri Zone or Upper Waitaki Hill Zone to accommodate the normal cyclical nature of farming and to enable adjustments of land use in response to physical conditions and markets.	Accept in part	In response to this submission point and other submissions we are recommending amendments to clause (c) of this policy.
PC5LWRP-2341A	Federated Farmers of New Zealand	Amend Policy 15B.4.20 to provide a land use flexibility cap allowing N discharge of up to 10 kg/ha/year as a permitted activity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.
PC5LWRP-1205	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.20 to combine the Policies 15B.4.19 and 15B.4.20 OR Make the distinction between these policies more apparent (by referring to aquaculture and farming activities respectively). AND Make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	In response to this submission point and other submission points we are recommending moving references to 'Aquaculture Nutrient User Groups' to Policy 15B.4.8.
PC5LWRP-1597	Director General of Conservation	Amend Policy 15B.4.20 as follows: Water and fish, bird and ~~F~~freshwater habitat quality is maintained in the Upper Waitaki Freshwater Management Unit by: And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-754	Central South Island	Amend Policy 15B.4.20(a) as follows:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Fish and Game Council	(a) restricting increases in nitrogen losses from farming activities in the Haldon Zone or Mid Catchment Zone to the Nitrogen Load Limits for that Zone in Table 15B(f) ; and ~~a limit not exceeding the Upper Waitaki Nitrogen headroom~~		
PC5LWRP-76	Meridian Energy Limited	Insert a new Policy 15B.4.20(a) as follows: (a) avoiding total nitrogen loss from farming activities in the Ahuriri, Haldon Zone or Mid Catchment Zones that will result in the nitrogen load limits specified in Table 15B(f) being exceeded; (ai) 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 Or words to the same effect and any consequential amendments.		
PC5LWRP-1752	Genesis Energy Limited	Insert a new Policy 15B.4.20(a) as follows: (a) avoiding total nitrogen loss from farming activities in the Ahuriri, Haldon Zone or Mid Catchment Zones that will result in the nitrogen load limits specified in Table 15B(f) being exceeded; (ai) 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		
PC5LWRP-408A	DairyNZ	Amend Policy 15B.4.20(b) as follows: (b) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Ahuriri Zone or Upper Waitaki Hill Zone to exceed the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP , except where Policy 15B.4.13 applies; and Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1752A	Genesis Energy Limited	Amend Policy 15B.4.20(b) as follows: (b) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Ahuriri Zone or Upper Waitaki Hill Zone to exceed the Baseline GMP Loss Rate or Nitrogen Baseline, whichever is the less, except where Policy 15B.4.13 applies; and Or words to the same effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1899A	Forest and Bird NZ	Amend Policy 15B.4.20(b) as follows: (b) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the ~~Ahuriri Zone or Upper Waitaki Hill Zone~~Haldon Zone and Mid Catchment Zone to exceed the Baseline GMP Loss Rate, ~~except where Policy 15B.4.13 applies~~ ; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-76A	Meridian Energy Limited	Amend Policy 15B.4.20(b) as follows: (b) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Ahuriri Zone or Upper Waitaki Hill Zone to exceed the Baseline GMP Loss Rate or Nitrogen Baseline, whichever is the less, except where Policy 15B.4.13 applies; and Or words to the same effect.		
PC5LWRP-1206	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.20(b) as follows: (b) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Ahuriri Zone or Upper Waitaki Hill Zone to exceed the Baseline GMP Loss Rate or, alternatively Loss Rate Assessed as Baseline GMP, except where Policy 15B.4.13 applies. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-408B	DairyNZ	Amend Policy 15B.4.20(c) as follows: (c) including, on any resource consent granted for the use of land for a farming activity,		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		conditions that require farming activities to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Baseline GMP , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , is less than either the Baseline GMP Loss Rate or the Upper Waitaki Nitrogen Headroom Limit; and Or words to similar effect.		
PC5LWRP-1206A	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.20(c) as follows: (c) including, on any resource consent granted for the use of land for a farming activity, conditions that require farming activities to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice, in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than either the Baseline GMP Loss Rate or the Upper Waitaki Nitrogen Headroom Limit. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-76B	Meridian Energy Limited	Amend Policy 15B.4.20(d) as follows: (d) applying to any resource consent granted for the use of land for a farming activity, or any permit granted for a discharge associated with an aquaculture operation or community wastewater activity, adaptive management conditions in accordance with the water quality limits and outcomes set out in Tables 15B(a), 15B(b), 15B(c),15B(d) and 15B(e), and to achieve the Waitaki Nitrogen load limits in Tables 15B(f)-(h). which include: (i) ensuring appropriate monitoring of the receiving environment (ii) imposing early warning triggers, where appropriate (iii) achieving consistency across all consents within the same environment (iv) identifying responsibilities and actions if exceedances occur. Or words to the same effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1752B	Genesis Energy Limited	Amend Policy 15B.4.20(d) as follows: (d) applying to any resource consent granted for the use of land for a farming activity, or any permit granted for a discharge associated with an aquaculture operation or community wastewater activity, adaptive management conditions in accordance with the water quality limits and outcomes set out in Tables 15B(a), 15B(b), 15B(c),15B(d) and 15B(e), and to achieve the Waitaki Nitrogen load limits in Tables 15B(f)-(h). which include: (i) ensuring appropriate monitoring of the receiving environment (ii) imposing early warning triggers, where appropriate (iii) achieving consistency across all consents within the same environment (iv) identifying responsibilities and actions if exceedances occur. Or words to the same effect.		
PC5LWRP-754A	Central South Island Fish and Game Council	Amend Policy 15B.4.20(d) as follows: (d) applying to any resource consent granted for the use of land for a farming activity, or any permit granted for a discharge associated with an aquaculture operation or community wastewater activity, adaptive management conditions in accordance with the freshwater outcomes set out in Tables 15B(a), 15B(b), and the water quality limits in Tables 15B(c),15B(d) and 15B(e) which may include: (i) imposing early warning triggers, (ii) identifying and requiring remedial actions if triggers are reached and exceedances occur (iii) ensuring timely and appropriate monitoring of the receiving waterbodies		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1597D	Director General of Conservation	Amend Policy 15B.4.20(d) as follows: ~~(d) applying to any resource consent granted for the use of land for a farming activity, or any permit granted for a discharge associated with an aquaculture operation or community wastewater activity, adaptive management conditions in accordance with the water quality limits set out in Tables 15B(c),15B(d) and 15B(e).~~ (d) Avoiding increases in nitrogen losses from farming activities adjacent to and upstream of threatened native fish habitat, in particular, springs and spring fed rivers. And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2147	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.20(d) to clarify how 'adaptive management conditions' are to apply to land use consents. OR Amend to define, if necessary, the term "adaptive management conditions" to be applicable to this policy; AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	In response to this submission we recommend an amendment to the policy to replace the phrase 'adaptive management conditions' with wording that more accurately reflects the intent sought by the policy.
PC5LWRP-1597E	Director General of Conservation	Amend Policy 15B.4.20(e) as follows: (e) specifically applying to all resource consents granted for the use of land for a farming activity, aquaculture operation, or waste water activity, adaptive management conditions providing for: 1. Water quality triggers; 2. Receiving environment monitoring; 3. Nutrient discharge allowances; 4. Graduated nutrient reductions; at a property, scheme or catchment level to meet the water quality outcomes in the relevant table 15B water quality limits or outcomes. And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Policy 15B.4.21 (now recommended Policy 15B.4.17)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1573	Director General of Conservation	Retain Policy 15B.4.21 as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 10(2)(b) and Clause 16(2) of Schedule 1 to the RMA, we recommend that the policy is retained as notified (with minor improvements to wording).
PC5LWRP-1624	Fertiliser Association of New Zealand	Retain Policy 15B.4.21 but provide for uncertainty in GMP loss rates and an alternative pathway for GMP N loss values and any consequential changes.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-311	DairyNZ	Retain Policy 15B.4.21 as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 10(2)(b) and Clause 16(2) of Schedule 1 to the RMA, we recommend that the policy is retained as notified (with minor improvements to wording).
PC5LWRP-2340	Federated Farmers of New Zealand	Retain Policy 15B.4.21 as notified.		
PC5LWRP-1900	Forest and Bird NZ	Delete Policy 15B.4.21.	Reject	The omission of this policy would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2099	Ravensdown Limited	Amend Policy 15B.4.21 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Insert an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Insert an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent • Delete the term: '~~sharing of nitrogen losses~~' and replace with either ' averaging ' or ' offsetting '; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process. In regard to the request to omit the phrase 'sharing of nitrogen losses' we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-64	Meridian Energy Limited	Amend Policy 15B.4.21(a) as follows: (a) notwithstanding (ai) to (d) below, cumulatively with nitrogen losses from all other farming activity in the Zone, the combined nitrogen loss calculation from the properties forming the Nutrient User Group that are located with the Ahuriri, Haldon or Mid-Catchment Zones, will not result in the nitrogen load limits specified in Table 15B(f) for those Zones being exceeded; and (ai) the property is part of a Nutrient User Group; Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1754	Genesis Energy Limited	Amend Policy 15B.4.21(a) as follows: (a) notwithstanding (ai) to (d) below, cumulatively with nitrogen losses from all other farming activity in the Zone, the combined nitrogen loss calculation from the properties forming the Nutrient User Group that are located with the Haldon or Mid-Catchment Zones, will not result in the nitrogen load limits specified in Table 15B(f) for either of those Zones being exceeded; and (ai) the property is part of a Nutrient User Group;… Or any decisions of similar effect.		
PC5LWRP-64A	Meridian Energy Limited	Amend Policy 15B.4.21(b) as follows: (b) all of the properties forming the Nutrient User Group are located within the Ahuriri Zone, and the combined nitrogen loss calculation from those properties does not exceed their combined Baseline GMP Loss Rate or the combined Nitrogen Baseline, whichever is the lesser; or Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1754A	Genesis Energy Limited	Amend Policy 15B.4.21(b) as follows: (b) all of the properties forming the Nutrient User Group are located within the Ahuriri Zone, and the combined nitrogen loss calculation from those properties does not exceed their combined Baseline GMP Loss Rate or the combined Nitrogen Baseline, whichever is the lesser; or Or any decisions of similar effect.		

Policy 15B.4.22 (now recommended Policy 15B.4.18)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1574	Director General of Conservation	Retain Policy 15B.4.22 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that it is substantially retained.
PC5LWRP-1626	Fertiliser Association of New Zealand	Retain provisions in Policy 15B.4.22 for flexibility linked to baseline N loss, but to avoid impressions of modelling precision, and round the N loss value up from 1.6 to 2 kg N/ha/yr.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2342	Federated Farmers of New Zealand	Amend Policy 15B.4.22 to provide a degree of flexibility to farming activities in the Ahuriri Zone to accommodate the normal cyclical nature of farming and to enable adjustments of land use in response to physical conditions and markets.		
PC5LWRP-1901A	Forest and Bird NZ	Delete Policy 15B.4.22(a).	Reject	The omission of this clause in this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-409	DairyNZ	Amend Policy 15B.4.22(a) as follows: Prior to Rules 5.43A, 5.46A, 5.53A, 5.54A, 15B.5.14 to 15B.5.23 becoming operative in accordance with clause 20 of Schedule 1 to the Resource Management Act 1991, water quality outcomes are met: (a) in the Haldon Zone and Mid Catchment Zone, by requiring farming activities that exceed the ~~average~~ highest annual nitrogen loss that occurred between 1 January 2011 and 31 December 2015 to restrict their nitrogen losses to no more than 1.6kgN/ha/yr above the nitrogen baseline; and Or words to similar effect.	Reject	The omission of this phrase in this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-481	The Wolds Station Ltd	Amend Policy 15B.4.22 (a) as follows: in the Haldon Zone and Mid Catchment Zone, by requiring farming activity that exceed the average nitrogen loss that occurred between ~~1 January 2011 to 31 December 2015~~ 1 January 2016 and 31 December 2016 to restrict their nitrogen losses to no more than 1.6kgN/ha/yr above the nitrogen baseline; and	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1901	Forest and Bird NZ	Amend Rule 15B.4.22(b) as follows: (b) in the ~~Ahuriri Zone~~Haldon Zone and Mid Catchment Zone , by requiring farming activities to restrict their nitrogen losses to no more than the average nitrogen loss rate that occurred between 1 January 2011 and 31 December 2015, or the nitrogen baseline.		
PC5LWRP-2103	Ravensdown Limited	Amend Policy 15B.4.22(b) as follows: (b) in the Ahuriri Zone, by requiring farming activities to restrict their nitrogen losses to no more than the greater of the average nitrogen loss rate that occurred between 1 January 2011 and 31 December 2015, or the nitrogen baseline. Or such other or alternative wording which would properly address the concerns raised.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-65A	Meridian Energy Limited	Amend Policy 15B.4.22(b) as follows: (b) in the Ahuriri Zone, by requiring farming activities to restrict their nitrogen losses to no more than the average nitrogen loss rate that occurred between 1 January 2011 and 31 December 2015, or the nitrogen baseline, whichever is the lesser; and Or words to similar effect.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-409A	DairyNZ	Amend Policy 15B.4.22(b) as follows: (b) in the Ahuriri Zone, by requiring farming activities to restrict their nitrogen losses to no more than the ~~average~~ highest annual nitrogen loss rate that occurred between 1 January 2011 and 31 December 2015, or the nitrogen baseline.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Or words to similar effect.		
PC5LWRP-1759A	Genesis Energy Limited	Amend Policy 15B.4.22(b) as follows: (b) in the Ahuriri Zone, by requiring farming activities to restrict their nitrogen losses to no more than the average nitrogen loss rate that occurred between 1 January 2011 and 31 December 2015, or the nitrogen baseline, whichever is the lesser; and Or words to similar effect.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-755	Central South Island Fish and Game Council	Amend Policy 15B.4.22 to include: (c) by avoiding nitrogen losses in the Ahuriri, Haldon and Mid Catchment Zones that will exceed the nitrogen load limits in Table 15B(f).	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-65B	Meridian Energy Limited	Amend Policy 15B.4.22 to include: (c) notwithstanding (a) and (b), by avoiding total nitrogen loss from farming activities in the Haldon, Mid-Catchment or Ahuriri Zones that will result in the nitrogen load limits specified in Table 15B(f) being exceeded. Or words to similar effect.		
PC5LWRP-1759B	Genesis Energy Limited	Amend Policy 15B.4.22 to include: (c)_ notwithstanding (a) and (b), by avoiding total nitrogen loss from farming activities in the Haldon, Mid-Catchment or Ahuriri Zones that will result in the nitrogen load limits specified in Table 15B(f) being exceeded. Or words to similar effect.		
PC5LWRP-1207	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.22(a) and (b) to clarify that the average [nitrogen loss] is to be 2011-2015 calculated for the property for which consent is sought, and make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Policy 15B.4.23 (now recommended Policy 15B.4.19)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1609	Director General of Conservation	Retain Policy 15B.4.23(a) and (b) as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1627	Fertiliser Association of New Zealand	Delete Policy 15B.4.23, OR Amend Policy 15B.4.23 to shift the onus back to regional and district council to identify areas of significant indigenous biodiversity.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-432	The Wolds Station Ltd	Delete Policy 15B.4.23		
PC5LWRP-1609A	Director General of Conservation	Amend Policy 15B.4.23 as follows: Significant indigenous terrestrial biodiversity and habitat is maintained in the four freshwater management units ~~Haldon Zone and Mid Catchment Zone~~ by... And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-366	Mackenzie District Council	Amend policy 15B.4.23 as follows: Significant indigenous biodiversity is ~~maintained~~protected in the Haldon Zone and Mid Catchment Zone by:	Accept	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1902	Forest and Bird NZ	Amend Policy 15B.4.23 to replace Haldon Zone and Mid Catchment Zone with Waitaki sub-regions and include the words "as defined in the CRPS" after "significant indigenous biodiversity" and "no net loss".	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-366A	Mackenzie District Council	Amend policy 15B.4.23(a) as follows: (a) the implementation of any relevant district council planning provisions ~~notified~~that are notified and take legal effect after 13 February 2016, that require the identification and protection of significant indigenous biodiversity; or	Accept	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-410	DairyNZ	Delete 15B.4.23(b).	Reject	The omission of this clause in this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-366B	Mackenzie District Council	Amend policy 15B.4.23(b) as follows: (b) until such district council planning provisions are notified and take legal effect, requiring as part of any application for resource consent for a farming activity to exceed the nitrogen baseline, an assessment of environmental effects which identifies the indigenous biodiversity values present within the application area, identifies the sites of significant indigenous biodiversity; and demonstrates that no net loss of significant indigenous biodiversity will occur.	Accept	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Policy 15B.4.24 (now recommended Policy 15B.4.20)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2106	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 15B.4.24 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-2555	Federated Farmers of New Zealand	Amend Policy 15B.4.24 to focus on good management practices which would produce positive environmental outcomes, within an alternative consenting framework.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2106A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Policy 15B.4.24 to provide a clear direction on the extent to which irrigation schemes or principal water suppliers can limit N loss such that their contribution to the catchment load and water quality outcomes is controlled and will ultimately meet catchment limits, rather than presenting the catchment limits and outcomes as the control point. Or such other or alternative wording which would properly address the concerns raised.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1903	Forest and Bird NZ	Amend Policy 15B.4.24 to delete the words "except where Policy 15B.4.13 and 15B.4.15 applies".	Accept in part	In response to this and other submissions we recommend the deletion of reference to Policy 15B.4.15.
PC5LWRP-1628	Fertiliser Association of New Zealand	Amend Policy 15B.4.24 to remove the word "avoiding" and provide for discretion when granting resource consent based on GMP Loss rates and provide for an alternative pathway for farm systems that cannot be addressed with the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In regard to the request to delete the word 'avoiding' we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1605	Director General of Conservation	Amend Policy 15B.4.24 as follows: Freshwater and habitat quality is maintained within the Hakataramea Freshwater Management Unit by: And further or alternative relief to like effect to that sought.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1605A	Director General of Conservation	Amend Policy 15B.4.24 by inserting a new clause as follows: (a) After 13 February 2016, avoiding adverse effects on threatened native fish habitats; And further or alternative relief to like effect to that sought.		
PC5LWRP-411	DairyNZ	Amend Rule 15B.4.24(a) as follows: (a) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Hakataramea Freshwater Management Unit to exceed the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP , except where Policy 15B.4.13 and 15B.4.15 apply; and Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2555A	Federated Farmers of New Zealand	Amend Policy 15B.4.24(a) as follows: (a) Avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Hakataramea Fresh Water Management unit to exceed the Baseline GMP Loss Rate plus 5 kg N/ha/year, except where Policies 15B.4.13 and 15B.4.15 apply;	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2044	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.24(a) as follows: (a) avoiding the granting of any resource consent that will allow nitrogen losses from farming activities in the Hakataramea Freshwater Management Unit to exceed the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP , except where Policy 15B.4.13 and 15B.4.15 apply; and AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-411A	DairyNZ	Amend Rule 15B.4.24(b) as follows: (b) restricting, in the Hakataramea River Zone, nitrogen losses from the portion of the property irrigated or used for winter grazing to ~~90% or less of~~ the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice, or less. Or words to similar effect.	Accept in part	We are recommending the omission of provisions requiring compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-2044B	Fonterra Co-operative	Amend Rule 15B.4.24(b) as follows:	Reject	These submissions request provision in Plan Change 5 for an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Group Ltd	(b) restricting, in the Hakataramea River Zone, nitrogen losses from the portion of the property irrigated or used for winter grazing to 90% or less of the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2555B	Federated Farmers of New Zealand	Amend Policy 15B.4.24(b) as follows: (b) Restricting in the Hakataramea River Zone, nitrogen losses for the portion of the property irrigated or used for winter grazing to ~~90% or less of~~ the Good Management Practice Loss Rate.	Accept in part	We are recommending the omission of provisions requiring compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-411B	DairyNZ	Amend Rule 15B.4.24(c) as follows: (c) requiring, in the Hakataramea Hill Zone and the Hakataramea Flat Zone, farming activities to operate at the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice, where that loss rate is less than the Baseline GMP Loss rate or Loss Rate Assessed as Baseline GMP. Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2044C	Fonterra Co-operative Group Ltd	Amend Rule 15B.4.24(c) as follows: (c) requiring, in the Hakataramea Hill Zone and the Hakataramea Flat Zone, farming activities to operate at the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice, where that loss rate is less than the Baseline GMP Loss rate or Loss or Loss Rate Assessed as Baseline GMP. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		

Policy 15B.4.25 (now recommended Policy 15B.4.21)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1905	Forest and Bird NZ	Retain 15B.4.25 as notified subject to changes to the permitted activity rules in Part A.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that it is substantially retained.
PC5LWRP-2110	Ravensdown Limited	Amend Policy 15B.4.25 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See Chapter 14 of this report.
PC5LWRP-1629	Fertiliser Association of New Zealand	Amend Policy 15B.4.25 to provide for discretion when granting resource consent based on GMP Loss rates and provide for an alternative pathway for farm systems that cannot be addressed with the Farm Portal and any consequential changes.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2557	Federated Farmers of New Zealand	Amend Policy 15B.4.25 to focus on good management practices which would produce positive environmental outcomes, within an alternative consenting framework [PC5LWRP-2425].		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2557A	Federated Farmers of New Zealand	Amend Policy 15B.4.25 as follows: ~~Only g~~Granting a resource consent for a farming activity to exceed the nitrogen baseline where the application demonstrates that the local in-stream and groundwater quality limits in Tables 15B(c) and 15B(e) will not be exceeded as a result of the farming activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1608	Director General of Conservation	Amend Policy 15B.4.25 as follows: Freshwater and habitat quality is maintained within the Valley and Tributaries Freshwater Management Unit by:	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1608A	Director General of Conservation	Amend Policy 15B.4.25 by inserting a new clause as follows: (a) After 13 February 2016, avoiding adverse effects on threatened native fish habitats; And further or alternative relief to like effect to that sought.		
PC5LWRP-412	DairyNZ	Amend Policy 15B.4.25(c) as follows: (c) including, on any resource consent granted for the use of land for a farming activity, conditions that require farming activities to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Baseline GMP ~~, in any circumstance where that Good Management Practice Loss Rate is less than either the Baseline GMP Loss Rate or the agricultural nitrogen load limit as calculated in accordance with Schedule 27~~ .	Accept in part	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2057A	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.25(c) to include Loss Rate Assessed as Good Management Practice and Loss Rate Assessed as Baseline GMP and clarify the applicability of the agricultural load limit in the context of this policy. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-2057B	Fonterra Co-operative Group Ltd	Provide for a consenting pathway that does not rely on the Farm Portal AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-2057	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.25(c) to standardise the use of terminology in Policy 15B.4.25 and Schedule 27. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2057C	Fonterra Co-operative Group Ltd	It is unclear how the policy is intended to work as the Baseline GMP Loss Rate is a limit expressed in kg/ha/yr while the agricultural load limit is a load expressed in tonnes per year. The metrics are quite different. Amend Policy 15B.4.25(c) to enable a direct comparison between the Baseline GMP Loss Rate and the Schedule 27 limits.	Accept in part	In response to this submission we recommend an amendment to clarify the relationship between the metrics referred to in the policy.

Policy 15B.4.26 (now recommended Policy 15B.4.22)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2111	Ravensdown Limited	Amend Policy 15B.4.26 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		• Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.		accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-1190	Waihuna Dairies Ltd	Amend to require properties in the Greater Waikakahi Zone to be at GMP not 90% of GMP.	Accept	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-2558	Federated Farmers of New Zealand	Amend Policy 15B.4.26 to focus on good management practices which would produce positive environmental outcomes, within an alternative consenting framework [PC5LWRP-2425] or alternatively amend to provide an alternative pathway for farm systems and individual situations where the Farm Portal is not capable or produces aberrant results.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1185	Waikakahi Farmers Group	Amend Policy 15B.4.26 to ensure further investigation is completed to assess the difference between modelled ECAN numbers and what is actually occurring now. There has been sufficient headroom created and a reduction to 90% of GMP is not required.	Accept in part	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-2064	Fonterra Co-operative Group Ltd	Amend Policy to include: Loss Rate Assessed as Good Management Practice and Loss Rate Assessed as Baseline GMP and clarify the applicability of the agricultural load limit in the context of this policy. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1630	Fertiliser Association of New Zealand	Amend Policy 15B.4.26 to remove the word "avoiding" and provide for discretion when granting resource consent based on GMP Loss rates and provide for an alternative pathway for farm systems that cannot be addressed with the Farm Portal and any consequential changes.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In regard to the request to omit the word 'avoiding' we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1906	Forest and Bird NZ	Amend Policy 15B.4.26 to delete the words "~~except where Policy 15B.4.13 and 15B.4.15 applies~~".	Accept in part	In response to this submission we are recommending omission of the reference to Policy 15B.4.15.
PC5LWRP-1575	Director General of Conservation	Amend Policy 15B.4.26 as follows: Freshwater quality and habitat is maintained within the Greater Waikākahi Zone by:	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1575A	Director General of Conservation	Amend Policy 15B.4.26 by inserting a new clause as follows: (a) After 13 February 2016, avoiding adverse effects on threatened native fish habitats; And further or alternative relief to like effect to that sought.		
PC5LWRP-414	DairyNZ	Amend Policy 15B.4.26(a) as follows: (a) avoiding the granting of a resource consent that will allow the nitrogen loss calculation from a farming activity in the Greater Waikākahi Zone to exceed the Baseline GMP Loss Rate, or Loss Rate Assessed as Baseline GMP, except where Policies 15B.4.13 and 15B.4.15 apply; and	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Or words to similar effect.		and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-414A	DairyNZ	Amend Policy 15B.4.26(b) as follows: (b) restricting nitrogen losses from the part of the property in the Greater Waikākahi Zone that is irrigated or used for winter grazing, to ~~no more than 90% of~~ the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice. Or words to similar effect.	Accept in part	We are recommending the omission of provisions requiring the compliance with 90% of GMP Limits. See Chapter 15.
PC5LWRP-2064A	Fonterra Co-operative Group Ltd	Amend Policy 15B.4.26 (b) as follows: (b) restricting nitrogen losses from the part of the property in the Greater Waikakahi Zone that is irrigated or used for winter grazing to no more than 90% of the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Policy 15B.4.27 (now recommended Policy 15B.4.23)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1907	Forest and Bird NZ	Delete Policy 15B.4.27.	Reject	The omission of this policy would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2112	Ravensdown Limited	Amend Policy 15B.4.27 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-1631	Fertiliser Association of New Zealand	Amend Policy 15B.4.27 to remove the word "avoiding" and provide for discretion when granting resource consent based on GMP Loss rates and provide for an alternative pathway for farm systems that cannot be addressed with the Farm Portal and any consequential changes.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. In regard to the request to omit the word 'avoiding' we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2560	Federated Farmers of New Zealand	Amend Policy 15B.4.27 to focus on good management practices which would produce positive environmental outcomes, within an alternative consenting framework [PC5LWRP-2425].	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
				limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2560A	Federated Farmers of New Zealand	Amend Policy 15B.4.27 as follows: ~~Only g~~Granting a resource consent for a farming activity to exceed the nitrogen baseline where the application demonstrates that the local in-stream and groundwater quality limits in Tables 15B(c) and 15B(e) will not be exceeded as a result of the farming activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-416	DairyNZ	Amend Policy 15B.4.27(c) as follows: (c) including, on any resource consent granted for the use of land for a farming activity, conditions that require farming activities to operate at or below the Good Management Practice Loss Rate, in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than either the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP or the agricultural nitrogen load limit as calculated in accordance with Schedule 27. Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Policy 15B.4.28 (now recommended Policy 15B.4.26)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1577	Director General of Conservation	Retain Policy 15B.4.28 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend it is substantially retained.
PC5LWRP-448	DairyNZ	Retain Policy 15B.4.28 as notified.		
PC5LWRP-1632	Fertiliser Association of New Zealand	Retain Policy 15B.4.28 as notified.		
PC5LWRP-1908	Forest and Bird NZ	Retain Policy 15B.4.28 as notified.		
PC5LWRP-2343	Federated Farmers of New Zealand	Retain Policy 15B.4.28 as notified.		
PC5LWRP-756	Central South Island Fish and Game Council	Amend Policy 15B.4.28 to provide clear direction in relation to plan changes which ensure that freshwater ecosystem health is safeguarded, that water quality limits will achieve healthy freshwater ecosystems and provide for recreational and intrinsic values of freshwater, and that rules ensure that water quality limits are not exceeded (over allocation is avoided) and where currently exceeded that they are achieved over a set timeframe.	Accept in part	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-494	Campbell A	Amend Policy 15B.4.28 to include wording to ensure that a healthy ecosystem and water quality is the foremost goal and ensure that any exceedance of the water quality limits be "stopped immediately".	Accept in part	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

15B.5 Rules - General

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1909	Forest and Bird NZ	Retain the notes providing guidance on where regional rules apply and which rules prevail.	Accept in part	We recommend retaining notes in the plan change where appropriate.
PC5LWRP-781	Waitaki Irrigators Collective Ltd	Amend to ensure consistency with dates that information is to be entered into Farm Portal.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-779	Waitaki Irrigators Collective Ltd	Amend to ensure consistency with dates that information is to be entered into Farm Portal.		
PC5LWRP-1016	Morven Glenavy Ikawai Irrigation Co Ltd	Amend to ensure consistency with dates that information is to be entered into Farm Portal.		
PC5LWRP-1017	Waitaki Irrigators Collective Ltd	Amend to ensure consistency with dates that information is to be entered into Farm Portal.		
PC5LWRP-2039	Bellfield Land Co Ltd	Amend to create a consenting pathway as a controlled activity to enable those who wish to change their NDA to align with PC5; AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Accept in part	In response to this submission we are recommending new Rule 15B.5.9.
PC5LWRP-2644	Craigmore Farming	Amend to adopt a simpler rule framework.	Accept in part	In response to this submission we are recommending amendments to Part B of PC5 to simplify the provisions.
PC5LWRP-936	Killermont Station 2012 Limited	Amend the Upper Waitaki rules to include provision for irrigation permits with NDAs to continue as permitted activities.	Accept in part	In response to this and other submissions we recommend an amendment to Rule 15B.5.8, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-979	Rietveld J A	Amend the Upper Waitaki rules to include provision for irrigation permits with NDAs to continue as permitted activities.		
PC5LWRP-1109	Twinburn Ltd	Amend the Upper Waitaki rules to include provision for irrigation permits with NDAs to continue as permitted activities.		
PC5LWRP-1130	Haldon Station Limited	Amend the Upper Waitaki rules to include provision for irrigation permits with NDAs to continue as permitted activities.		
PC5LWRP-2002	Bellfield Land Co Ltd	Amend the Upper Waitaki rules to include provision for irrigation permits with NDAs to continue as permitted activities.		
PC5LWRP-1163	Craigmore Farming	Amend the rules to replace 'Accredited Farm Consultant' with ‘Certified Farm Environment Plan Auditor'.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1175	Keeling Dairies Ltd	Amend the rules to replace 'Accredited Farm Consultant' with ‘Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-2060	Kakahu Catchment Group	Amend the rules to replace 'Accredited Farm Consultant' with ‘Certified Farm Environment Plan Auditor'.		
PC5LWRP-888	Orari Water Users Group	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor AND any related objective, policy or rule that alters as a result of our submission or any other		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		submissions made.		
PC5LWRP-891	Kokoamo Farms Limited	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-897	Spectrum Group	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-1151	Cameron W N and S P	Amend the rules to replace 'Accredited Farm Consultant' with 'Certified Farm Environment Plan Auditor' AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-2663	Mackenzie Irrigation Company Ltd	Amend the reference in the rules from Accredited Farm Consultant to Certified Farm Environment Plan Auditor.		
PC5LWRP-2623	Federated Farmers of New Zealand	Amend the Greater Waikakahi Zone Rules to apply Rules 15B.5.34-15B.5.38 to areas in existing Green Nutrient Allocation Zones.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2039A	Bellfield Land Co Ltd	Amend rules to reflect changes to Table 15B(d) See PC5LWRP-2039 AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-2645	Killermont Station 2012 Limited	Amend rules to make provision for consent holders holding a water permit with an NDA that manages nitrogen and phosphorus losses and water quality monitoring conditions to continue as a permitted activity.	Accept in part	In response to this and other submissions we recommend an amendment to Rule 15B.5.8, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2646	Twinburn Ltd	Amend rules to make provision for consent holders holding a water permit with an NDA that manages nitrogen and phosphorus losses and water quality monitoring conditions to continue as a permitted activity.		
PC5LWRP-2647	Haldon Station Limited	Amend rules to make provision for consent holders holding a water permit with an NDA that manages nitrogen and phosphorus losses and water quality monitoring conditions to continue as a permitted activity.		
PC5LWRP-2708	Rietveld J A	Amend rules to make provision for consent holders holding a water permit with an NDA that manages nitrogen and phosphorus losses and water quality monitoring conditions to continue as a without further consent requirement.		
PC5LWRP-953	Killermont Station 2012 Limited	Amend rules to create a consenting pathway as a controlled activity to enable those who wish to change their NDA to align with PC5.	Accept in part	In response to this submission we are recommending new Rule 15B.5.9.
PC5LWRP-985	Rietveld J A	Amend rules to create a consenting pathway as a controlled activity to enable those who wish to change their NDA to align with PC5.	Accept in part	
PC5LWRP-1114	Twinburn Ltd	Amend rules to create a consenting pathway as a controlled activity to enable those who wish		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		to change their NDA to align with PC5.		
PC5LWRP-1135	Haldon Station Limited	Amend rules to create a consenting pathway as a controlled activity to enable those who wish to change their NDA to align with PC5.		
PC5LWRP-2634	Kakahu Catchment Group	Amend Rules 5.41A – 5.59A to adopt a simpler rule framework.	Accept in part	These submission points request simplification of the provisions in Part B of Plan Change 5. We agree, for the reasons set out in the Section 42A Report, that some amendments to the provisions in Part B of Plan Change 5 are appropriate to remove duplication and improve understanding of the plan change.
PC5LWRP-2357	Federated Farmers of New Zealand	Amend Part B rules to Build a system of flexibility caps into the Section 15B Rule framework - 10 Kg N/ha/year for Upper Waitaki and 15 kg/ha/year for the Lower Waitaki Zones.	Reject	See Chapter 11 of this report
PC5LWRP-1498	Mackenzie Irrigation Company Ltd	The submitter is concerned that there are no rule to linking catchment loads for the Ahuriri Zone in Table 15B(f) in order to manage and enforce catchment loads.	Reject	A general request which does not give precise details of amendments requested.

15B.5 Rules – New Rules and Replacement Rules

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-786 PC5LWRP-1022	Waitaki Irrigators Collective Ltd Morven Glenavy Ikawai Irrigation Co Ltd	Insert new rules as follows: Incidental Nutrient Discharges 15B.5.9A The discharge of nutrients onto or into land in circumstances that may result in a contaminant entering water that would otherwise contravene s15(1) of the RMA is a permitted activity, provided the following condition is met: The land use activity associated with the discharge is authorised under Rules 15B.5.13A - 15B.5.I. 15B.5.9B The discharge of nutrients onto or into land in circumstances that may result in a contaminant entering water that would otherwise contravene s15(1) of the RMA and does not meet the conditions of Rule 15B.5.9A is a non-complying activity.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2172	Fonterra Co-operative Group Ltd	Insert new discretionary activity rules 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 AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-919	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Insert a new rule (15B.5.3) as follows: The discharge of contaminants from aquaculture into surface water or from mahinga kai enhancement onto or into land in circumstances where contaminants may enter water, is a permitted activity, provided that the following conditions are met: 1. The nitrogen loss calculation for the property does not exceed 15kgs per year; and 2. An Aquaculture Environment Plan is prepared in accordance with Schedule 26 and provided to Canterbury Regional Council on request.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 4 of this report.
PC5LWRP-790	Waitaki Irrigators Collective Ltd	Insert new rules to replace Rules 15B.5.24-15B.5.48 as follows: All Management Zones excluding the Hakataramea River Zone, Hakataramea Hill Zone, and Greater Waikakahi Zone	Accept in part	In general, we reject the alternative rule framework as proposed by this submitter (See Chapter 16 of this report for further discussion on this point).

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1026	Morven Glenavy Ikawai Irrigation Co Ltd	15B.5.A The use of land for a farming activity is a permitted activity provided the following conditions are met: (1) The property is less than ten hectares; or (2) The property is greater than ten hectares, but not more than 25% of the total farm area is irrigated; or (3) The property is greater than ten hectares, but not more than 10% of the total farm area is used for Winter Grazing. Valley and Tributaries and Whitneys Creek Zone 15B.5.B The use of land for a farming activity in the Valley and Tributaries Freshwater Management Unit or Whitneys Creek Freshwater Management Unit, which is not permitted by Rule 15B.5.W, is a permitted activity provided the following conditions are met: (1) (a) the nitrogen loss from the farming activity is being managed under a resource consent that is held by an irrigation scheme or principal water supplier and the permit is subject to conditions which require the preparation and implementation of a plan to mitigate the effects of the loss of nutrients to water and that plan specifies auditing requirements; or (b) the land is subject to any other permit that is subject to conditions which require the preparation and implementation of a plan to mitigate the effects of the loss of nutrients to water and that plan specifies auditing requirements; or (2) A Farm Environment Plan has been prepared, implemented and is audited in accordance with Schedule 7; and (3) The property is registered in the Farm Portal by 1 July 2017 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every 24 months thereafter. 15B.5.C The use of land for a farming activity in the Valley and Tributaries Freshwater Management Unit or Whitneys Creek Freshwater Management Unit, which is not permitted by Rule 15B.5.W and where any of the conditions of rule 15B.5.X are not complied with, is a restricted discretionary activity. The exercise of discretion is restricted to the following matters: 1. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 2. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 3. Reporting of estimated nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 4. Compliance with the local in-stream and groundwater quality limits set out in Tables 15B(c) and 15b(e) for the relevant zone. Hakataramea River Zone and Greater Waikakahi Zone 15B.5.D The use of land for a farming activity in the Hakataramea River Zone or Greater Waikakahi Zone, is a permitted activity provided the property is less than ten hectares. 15B.5.E The use of land for a farming activity in the Hakataramea River Zone or Greater Waikakahi Zone, which is not permitted by Rule 15B.5.A, is a restricted discretionary activity. The exercise of discretion is restricted to the following matters: 1. The existing use of land within the zone and whether this is proposed to change; and 2. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 3. Any other resource consents held that are subject to water quality management conditions;		However, in response to this submission, we recommend amendments to Part B of PC5 to permit (in specified circumstances) the use of land for a farming activity where the irrigation of that land is authorised by an existing water permit, and that permit is subject to conditions that require the implementation of a plan to mitigate the effects of the loss of nutrients to water.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		and 4. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 5. Reporting of estimated nutrient losses and audit results of a Farm Environment Plan to the Canterbury Regional Council; and6. Whether the granting of consent is likely to result in the local in-stream and groundwater quality limits set out in Tables 15B(c) and 15b(e) for the Hakataramea Zone being breached. Hakataramea Hill Zone 15B.5.F In the Hakataramea Hill Zone, the use of land for a farming activity is a permitted activity, provided the following conditions are met: (1) The property is less than ten hectares; or (2) The property is registered in the Farm Portal by 1 July 2017 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every 24 months thereafter; and (3) No part of the property within the Hakataramea Hill Zone is irrigated with water; and (4) No part of the property within the Hakataramea Hill Zone is used for winter grazing; and (5) A Farm Environment Plan has been prepared, implemented and audited in accordance with Schedule 7. 15B.5.G The use of land for a farming activity in the Hakataramea Hill Zone, on a property greater than 10 hectares, where any of the conditions of rule 15B.5.B are not complied with, is a restricted discretionary activity. The exercise of discretion is restricted to the following matters: 1. The use of land within the zone and whether this is proposed to change; and 2. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 3. Any other resource consents held that are subject to water quality management conditions; and 4. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 5. Reporting of estimated nutrient losses and audit results of a Farm Environment Plan to the Canterbury Regional Council; and 6. Compliance with the local in-stream and groundwater quality limits set out in Tables 15B(c) and 15b(e) for the Hakataramea Zone. Hakataramea Flat Zone 15B.5.H The use of land for a farming activity in the Hakataramea Flat Zone, which is not permitted by Rule 15B.5.A, is a permitted activity, provided the following conditions are met: (1) (a) the nitrogen loss from the farming activity is being managed under a resource consent that is held by an irrigation scheme or principal water supplier and the permit subject to conditions which require the preparation and implementation of a plan to mitigate the effects of the loss of nutrients to water and that plan specifies auditing requirements; or (b) the land is subject to any other permit that is subject to conditions which require the preparation and implementation of a plan to mitigate the effects of the loss of nutrients to water and that plan specifies auditing requirements; and (2) A Farm Environment Plan has been prepared, implemented and is audited in accordance with Schedule 7; and (3) The property is registered in the Farm Portal by 1 July 2017 and information about the farming 1activity and the property is reviewed and updated by the property owner or their agent, every 24 months thereafter.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		15B.5.I The use of land for a farming activity in the Hakataramea Flat Zone, which is not permitted by Rule 15B.5.A, or where any of the conditions of rule 15B.5.E are not complied with, is a restricted discretionary activity. The exercise of discretion is restricted to the following matters: 1. The use of land within the zone and whether this is proposed to change; and 2. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 3. Any other resource consents held that are subject to water quality management conditions; and 4. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 5. Reporting of estimated nutrient losses and audit results of a Farm Environment Plan to the Canterbury Regional Council; and 6. Compliance with the local in-stream and groundwater quality limits set out in Tables 15B(c) and 15b(e) for the Hakataramea Zone. AND any and all other subsequent or consequential amendments to any rules or policies required in order to enable the intent of the changes proposed alternative framework.		

Rule 15B.5.1

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1910	Forest and Bird NZ	Retain Rule 15B.5.1 as notified.	Accept	We agree that retaining this rule is appropriate.

Rule 15B.5.2

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1911	Forest and Bird NZ	Retain Rule 15B.5.2 as notified.	Accept	We agree that retaining this rule is appropriate.

Rule 15B.5.3

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1912	Forest and Bird NZ	Retain Rule 15B.5.3 as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-907	Mt Cook Alpine Salmon Ltd	Amend Rule 15B.5.3(2) to explain whether nutrient load limit includes headroom allocation or is based on existing consented loads.	Reject	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the rule is retained as notified (with minor improvements to wording).
PC5LWRP-1308	Benmore Station	Amend Rule 15B.5.3 to develop a clear process for adaptive management of aquaculture. Submitter states monitoring is not considered to be an adequate form of management.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1299	Ellis-Lea Farm	Amend Rule 15B.5.3 to achieve greater immediate controls on aquaculture where water quality parameters are not met.		
PC5LWRP-1218	West Edge	Submitter requests the need to specify how and when aquaculture must modify its practices in situations where water quality deteriorates.		
PC5LWRP-1271	Twizel Dairy	Submitter requests an approach whereby there is a direct adaptive management regime for		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		aquaculture.		

Rule 15B.5.4

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-912	Mt Cook Alpine Salmon Ltd	Retain Rule 15B.5.4 as notified.	Accept in part	Except to the extent that we recommend amendments under Clause 16(2) of Schedule 1 to the RMA, we recommend that the rule is retained as notified (with minor improvements to wording).
PC5LWRP-1913	Forest and Bird NZ	Retain Rule 15B.5.4 as notified.		

Rule 15B.5.5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1914	Forest and Bird NZ	Retain Rule 15B.5.5 as notified.	Accept	We agree that retaining this rule is appropriate.

Rule 15B.5.6 (now recommended Rule 15B.5.8)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2359	Federated Farmers of New Zealand	Retain Rule 15B.5.6 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that it is substantially retained.
PC5LWRP-449	DairyNZ	Retain Rule 15B.5.6 as notified.		
PC5LWRP-1633	Fertiliser Association of New Zealand	Retain Rule 15B.5.6 as notified.		
PC5LWRP-2113	Ravensdown Limited	Retain Rule 15B.5.6 as notified.		
PC5LWRP-1915	Forest and Bird NZ	Delete Rule 15B.5.6.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1431	Glentanner Station Limited	Amend Rule 15B.5.6 to include permitted activity status for irrigation water permits that were not granted or commenced before 13 February 2016.	Accept in part	In response to this submission we recommend an amendment to the date in this rule, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1300	Ellis-Lea Farm	Amend Rule 15B.5.6 (b)(i) as follows: ~~the permit was granted~~ an application was applied for prior to 13 February 2016; and	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1230	West Edge	Amend Rule 15B.5.6 (b)(i) as follows: ~~the permit was granted~~ an application was applied prior to 13 February 2016; and		
PC5LWRP-1239	Benmore Irrigation Company Ltd - Shepherd B	Amend Rule 15B.5.6 (b)(i) as follows: ~~the permit was granted~~ an application was applied prior to 13 February 2016; and		
PC5LWRP-1289	Twizel Dairy	Amend Rule 15B.5.6 (b)(i) as follows: ~~the permit was granted~~ an application was applied for prior to 13 February 2016; and		
PC5LWRP-1310	Benmore Station	Amend Rule 15B.5.6 (b)(i) as follows: ~~the permit was granted~~ an application was applied prior to 13 February 2016; and		

Rule 15B.5.7

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1916	Forest and Bird NZ	Retain Rule 15B.5.7 as notified.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2114	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.7.		
PC5LWRP-1366	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.7, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1634	Fertiliser Association of New Zealand	Amend Rule 15.5.7 to provide for an alternative pathway where farm systems cannot be addressed by the Farm Portal.	Accept in part	In response to other submissions we are requesting the omission of this rule. However, we note this submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to other provisions in Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2114A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.7 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	In response to other submissions we are requesting the omission of this rule. However, we note this submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to other provisions in Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-1157	Cameron W N and S P	Amend to ensure water permits whose appeals were not resolved until late 2011 are captured by the rule. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1653	Director General of Conservation	Amend Rule 15B.5.7 as follows: Change the activity status to restricted discretionary activity;	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2570	Federated Farmers of New Zealand	Amend Rule 15B.5.7 to apply separate N discharge conditions to the FMU's, as follows: • Hakataramea: as requested in submission on Policy 15B.4.24 Waitaki Valley and Tributaries: as requested in submission on Policy 15B.4.25 • The Northern Fan FMU should be split into Greater Waikakahi (largely Green Zone) and Whitneys Creek (contains a substantial area of Red Zone) and apply N discharge conditions as follows: • Red Zone part of Greater Waikākahi: as per notified rule. • Green Zone part of Greater Waikākahi; as requested in submission on Policy 15B.4.27. • Whitneys Creek: as requested in submission on Policy 15B.4.27.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-450	DairyNZ	Amend Rule 15B.5.7(2)(a) as follows:	Reject	This submission requests provision in Plan Change 5 for an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		the Good Management Practice Loss Rate or Loss Rates Assessed as Good Management Practice for the farming activity proposed when the applicant's water permit was granted; and Or words to similar effect.		alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to other provisions in Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-450A	DairyNZ	Amend Rule 15B.5.7(2)(b) as follows: within the Hakataramea River Zone and Greater Waikākahi Zone and from 1 January 2020, ~~90% of~~ the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice for the part of the property used for irrigation or winter grazing authorised by the applicant's water permit.		
PC5LWRP-2114B	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Delete Rule 15B.5.7 (2)(b)	Accept in part	We are recommending the omission of this rule for the reasons set out in other submissions.
PC5LWRP-450B	DairyNZ	Amend Rule 15B.5.7 matter of discretion (4) as follows: (4) Methods to ensure compliance with the Good Management Practice Loss Rates or Loss Rates Assessed as Good Management Practice for the farming activity or any required reductions beyond Good Management Practice; and Or words to similar effect.	Reject	This submission requests provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to other provisions in Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-920	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.7 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 158.4.xx;	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1653A	Director General of Conservation	Amend Rule 15B.5.7 to include the following matter of control: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.		
PC5LWRP-1653B	Director General of Conservation	Amend Rule 15B.5.7 to include the following matter of control: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.		

Rule 15B.5.8 (now recommended Rule 15B.5.34)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1917	Forest and Bird NZ	Retain Rule 15B.5.8 as notified.	Accept in part	We agree that retaining this rule is appropriate.
PC5LWRP-2360	Federated Farmers of New Zealand	Retain Rule 15B.5.8 as notified.		
PC5LWRP-150	Hunter Downs Development Company Limited	Delete Rule 15B.5.8.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1027	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Rule 15B.5.8 as follows: The discharge of nutrients onto or into land where the property is supplied with water by an irrigation scheme or principal water supplier is a discretionary permitted activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-68	Meridian Energy	Amend Rule 15B.5.8 to include new condition as follows:	Reject	We are not persuaded that the amendment requested would

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited	(2) the nitrogen loss calculation for the property does not result in the total Nitrogen Headroom for all farming properties within the Haldon or Mid Catchment Zones, calculated in accordance with Schedule 27, being exceeded. Or words to the same effect.		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1773	Genesis Energy Limited	Amend Rule 15B.5.8 to include new condition as follows: (2) the nitrogen loss calculation for the property does not result in the total Nitrogen Headroom for all farming properties within the Haldon or Mid Catchment Zones, calculated in accordance with Schedule 27, being exceeded. Or words to the same effect.		

Rule 15B.5.9 (now recommended Rule 15B.5.35)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1918	Forest and Bird NZ	Retain Rule 15B.5.9 as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-2361	Federated Farmers of New Zealand	Retain Rule 15B.5.9 as notified.		
PC5LWRP-151	Hunter Downs Development Company Limited	Delete Rule 15B.5.9.	Reject	The omission of this rule would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1243	Benmore Irrigation Company Ltd - Shepherd B	Amend Rule 15B.5.9 by deleting prohibited use status.		
PC5LWRP-2120	Ravensdown Limited	Amend the activity status of Rule 15B.5.9 from prohibited to a discretionary activity.		
PC5LWRP-2120A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.9 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 ; • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-69	Meridian Energy Limited	Amend Rule 15B.5.9 as follows: The discharge of nutrients onto or into land where the property is supplied with water by an irrigation scheme or principal water supplier that does not meet condition s 1 and 2 of Rule 15B.5.8 is a prohibited activity. Or words to similar effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1774	Genesis Energy Limited	Amend Rule 15B.5.9 as follows: The discharge of nutrients onto or into land where the property is supplied with water by an irrigation scheme or principal water supplier that does not meet condition s 1 and 2 of Rule		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		15B.5.8 is a prohibited activity. Or words to similar effect.		
PC5LWRP-783	Waitaki Irrigators Collective Ltd	Amend Rule 15B.5.9 as follows: The discharge of nutrients onto or into land where the property is supplied with water by an irrigation scheme or principal water supplier that does not meet condition 1 of Rule 15B.5.8 is a ~~prohibited~~non-complying activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1020	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Rule 15B.5.9 as follows: The discharge of nutrients onto or into land where the property is supplied with water by an irrigation scheme or principal water supplier that does not meet condition 1 of Rule 15B.5.8 is a ~~prohibited~~non-complying activity.		

Upper Waitaki Freshwater Management Unit

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1552	Mackenzie Irrigation Company Ltd	Amend Upper Waitaki rules to include provision for irrigation permits with NDA's to continue as a permitted activity.	Accept in part	In response to this submission we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Rule 15B.5.10 (now recommended Rule 15B.5.32)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1920	Forest and Bird NZ	Delete Rule 15B.5.10.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1367	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.10, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1637	Fertiliser Association of New Zealand	Amend Rule 15B.5.10 to provide a standard or a mechanism by which the risk of exceeding water quality attributes in Tables 15B (c), (d), (e) and (f) can be assessed.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2127A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.10 to: • Provide an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2362	Federated Farmers of New Zealand	Amend Rule 15B.5.10(3) as follows: (3) The nitrogen loss calculation for the nutrient user group does not cause the relevant limits set out in Tables 15B(c), 15B(d), 15B(e) and 15B(f) to be exceeded due to farming activities;...	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-71	Meridian Energy Limited	Amend Rule 15B.5.10(4) as follows: 4. The aggregated nitrogen loss calculation for properties located within the Ahuriri Zone does not exceed the aggregate of the lesser of the Baseline GMP Loss Rate or Nitrogen Baseline for those properties; and Or any decisions of similar effect and any consequential amendment necessary.		
PC5LWRP-1637A	Fertiliser Association of New Zealand	Amend Rule 15B.5.10(4) to provide for an alternative pathway where farm systems that cannot be addressed by the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-451	DairyNZ	Amend Rule 15B.5.10(4) as follows: 4. The aggregated nitrogen loss calculation for properties located within the Ahuriri Zone does not exceed the aggregate of the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP for those properties; and		
PC5LWRP-1775	Genesis Energy Limited	Amend Rule 15B.5.10(4) as follows: 4. The aggregated nitrogen loss calculation for properties located within the Ahuriri Zone does not exceed the aggregate of the lesser of the Baseline GMP Loss Rate or Nitrogen Baseline for those properties; and Or any decisions of similar effect and any consequential amendment necessary.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-71B	Meridian Energy Limited	Amend Rule 15B.5.10(5) as follows: 5. The aggregated nitrogen loss calculation for properties located within the Haldon or Mid-Catchment Zone does not exceed the aggregate of the Upper Waitaki Headroom available for those properties and does not result in the total Nitrogen Headroom for all farming properties within the Zone, calculated in accordance with Schedule 27, being exceeded ; Or any decisions of similar effect.	Accept in part	Amendments we are recommending to the formula in Schedule 27 substantially address this issue.
PC5LWRP-757	Central South Island Fish and Game Council	Amend Rule 15B.5.10(5) as follows: (5) The properties forming the Nutrient User Group are ~~The aggregated nitrogen loss calculation for properties~~ located within the Haldon or Mid Catchment Zone , and the combined nitrogen loss calculation for those properties does not exceed the aggregate of the Upper Waitaki Headroom associated ~~available for~~ with those properties, which is calculated from the Nitrogen load limits in Table 15B(f).	Accept in part	In response to this submission we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1775A	Genesis Energy Limited	Amend Rule 15B.5.10 (5) as follows: 5. The aggregated nitrogen loss calculation for properties located within the Haldon or Mid-Catchment Zone does not exceed the aggregate of the Upper Waitaki Headroom available for those properties and does not result in the total Nitrogen Headroom for all farming properties within the Zone, calculated in accordance with Schedule 27, being exceeded ; Or any decisions of similar effect.	Accept in part	Amendments we are recommending to the formula in Schedule 27 substantially address this issue.
PC5LWRP-71A	Meridian Energy Limited	Retain Rule 15B.5.10(6) Or any decisions of similar effect.	Accept	We agree that retaining the condition of this rule is appropriate.
PC5LWRP-757A	Central South Island Fish and Game Council	Retain 15B.5.10(6).		
PC5LWRP-1775B	Genesis Energy Limited	Retain Rule 15B.5.10(6). Or any decisions of similar effect.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-451A	DairyNZ	Amend Rule 15B.5.10(6) as follows: 6. For any property within a Lake Zone, the nitrogen loss calculation for the property does not exceed the lesser of the nitrogen baseline or the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP; and Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2127B	Ravensdown Limited	Amend Rule 15B.5.10 to insert a condition to provide clear direction on the extent to which members of a nutrient user group can limit N losses such that their contribution to the catchment load and water quality outcomes is controlled and will ultimately meet catchment limits, rather than presenting the catchment limits and outcomes as the control point. Or such other or alternative wording which would properly address the concerns raised.	Reject	A general request which does not give precise details of amendments requested.

Rule 15B.5.11 (now recommended Rule 15B.5.33)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2367	Federated Farmers of New Zealand	Retain Rule 15B.5.11 as notified.	Accept	We agree that retaining the rule is appropriate.
PC5LWRP-1921	Forest and Bird NZ	Delete Rule 15B.5.11.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-452	DairyNZ	Amend Rule 15B.5.11 as follows: The use of land for a farming activity that forms part of a Nutrient User Group that does not comply with one or more of the conditions in Rule 15B.5.10 is a ~~prohibited~~ non-complying activity.		
PC5LWRP-1640	Fertiliser Association of New Zealand	Amend Rule 15B.5.11 from a prohibited activity to a discretionary activity.		
PC5LWRP-2129	Ravensdown Limited	Amend Rule 15B.5.11 from a prohibited activity to a discretionary activity.		
PC5LWRP-2129A	Ravensdown Limited	Amend to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Rule 15B.5.12 (now recommended Rule 15B.5.6)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1922	Forest and Bird NZ	Delete Rule 15B.5.12.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 15B.5.13 (now recommended Rule 15B.5.7)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1923	Forest and Bird NZ	Delete Rule 15B.5.13.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 15B.5.13A (now recommended Rule 15B.5.10)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2139	Ravensdown Limited	Retain Rule 15B.5.13A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend it is substantially retained.
PC5LWRP-2368	Federated Farmers of New Zealand	Retain Rule 15B.5.13A as notified.		
PC5LWRP-1642	Fertiliser Association of New Zealand	Retain Rule 15B.5.13A as notified.		
PC5LWRP-378	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-913B	Killermont Station 2012 Limited	Amend Rule 15.5.13A to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-1107B	Twinburn Ltd	Amend Rule 15.5.13A to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-1460	Mackenzie Irrigation Company Ltd	Amend Rule 15B.5.13A to explain clearly that if any nutrient headroom was to become available (due to the lake's TLI levels reducing), it would first be available to the low emitters.		
PC5LWRP-1999	Bellfield Land Co Ltd	Amend Rule 15B.5.13A to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. Permitted status is required for consents granted after this date with NDA. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1436	Glentanner Station Limited	Amend Rule 15B.5.13A to include permitted activity status for irrigation water permits that were not granted or commenced before 13 February 2016	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-347	Becker M	Amend Rule 15B.5.13A(3) to ensure granted water take consents with a Nitrogen Discharge Allowance that have not been implemented are provided for.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-913	Killermont Station 2012 Limited	Amend Rule 15B.5.13A 3(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity rule] is required for consents after this date with [an] NDA.	Accept in part	In response to this and other submissions we recommend amending the date to 18 February 2016, for the reasons set out in submissions or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-973	Rietveld J A	Amend 15B.5.13A 3(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity status] is sought for consents after this date with [an] NDA.		
PC5LWRP-1107	Twinburn Ltd	Amend 15B.5.13A 3(a), or add an additional rule to provide for change of conditions/new		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity rule] is required for consents after this date with [an] NDA.		
PC5LWRP-1126	Haldon Station Limited	Amend 15B.5.13A 3(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity rule] is required for consents after this date with [an] NDA.		
PC5LWRP-1501	Mackenzie Irrigation Company Ltd	The submitter seeks clarification of Rule 15B.5.13A(3)(a) what the date of consents granted prior to 13 February 2016 means for any subsequent variations or replacements to consents that occur after this date. The submitter states that a non-complying status is inappropriate.		
PC5LWRP-973A	Rietveld J A	Clarify intent of 15B.5.13A(3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.	Reject	We are not persuaded that providing for consents that are subject to appeal would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-913A	Killermont Station 2012 Limited	Clarify intent of Rule 15B.5.13A, Condition (3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1107A	Twinburn Ltd	Clarify intent of 15B.5.13A (3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1126A	Haldon Station Limited	Clarify intent of 15B.5.13A (3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1501A	Mackenzie Irrigation Company Ltd	The submitter seeks clarification of Rule 15B.5.13A(3)(b) and if it applies to consents granted that are in the appeal process.		
PC5LWRP-1999A	Bellfield Land Co Ltd	The submitter seeks clarification of Rule 15B.5.13A(3)(b) and seeks to amend the rule to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1532A	Mackenzie Irrigation Company Ltd	Explain the intention of commencement of consents granted or in appeal rather than physically irrigating to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1532	Mackenzie Irrigation Company Ltd	Insert a new rule so that new consents after the 13 February 2016, provided that they have an existing consented Nitrogen Discharge Allowance (NDA), are a permitted activity.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 15B.5.13B (now recommended Rule 15B.5.11)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1645	Fertiliser Association of New Zealand	Amend Rule 15B.5.13B from a non complying activity to a restricted discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2169	Ravensdown Limited	Amend Rule 15B.5.13B activity status to a restricted discretionary activity, with Council restricting its discretion to the conditions of Rule 15B.5.13A that are not met.		
PC5LWRP-2369	Federated Farmers of New Zealand	Amend Rule 15B.5.13B from a non complying activity to discretionary activity.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2699	Killermont Station 2012 Limited	Amend Rule 15B.5.13B to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2701	Twinburn Ltd	Amend Rule 15B.5.13B to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2780	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.		

Rule 15B.5.14 (now recommended Rule 15B.5.12)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1371	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.14, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2178	Ravensdown Limited	Amend Rule 15B.5.14 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-1648A	Fertiliser Association of New Zealand	Amend to provide an alternate pathway for circumstances where the farm system cannot be addressed by the Farm Portal.		
PC5LWRP-2575	Federated Farmers of New Zealand	Amend Rule 15B.5.14 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results		
PC5LWRP-2694	Killermont Station 2012 Limited	Amend Rule 15B.5.14 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2702	Twinburn Ltd	Amend Rule 15B.5.14 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2781	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.		
PC5LWRP-2694	Killermont Station 2012 Limited	Amend Rule 15B.5.14 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2702	Twinburn Ltd	Amend Rule 15B.5.14 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2781	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.		
PC5LWRP-1445	Mackenzie Irrigation	Amend Rule 15B.5.14 to exclude the use of narratives and instead use a percentage of the total		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Company Ltd	farm area.		
PC5LWRP-2641	Craigmore Farming	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-81	Bellfield Land Co Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-961	Killermont Station 2012 Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1003	Rietveld J A	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1121	Twinburn Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1142	Haldon Station Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-2627	Waitaki Irrigators Collective Ltd	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing. Submitter seeks new rule framework in Part B - Section 15B [refer to PC5LWRP-790] and requests that region-wide rules be amended to this effect.		
PC5LWRP-2632	Kakahu Catchment Group	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-477	Ballance Agri-Nutrients Limited	Amend Rule 15B.5.14(1) as follows: ...and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24 months~~36 months thereafter, unless there is a material change to the farm system ; and	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1648	Fertiliser Association of New Zealand	Amend Rule 15B.5.14(1) as follows: 1. The property is registered in the Farm Portal by 1 July 20~~17~~18 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a significant farm system change; and…		
PC5LWRP-1525	Beef and Lamb New Zealand Ltd	Amend Rule 15B.5.14(2) as follows: 2. The area of the property authorised to be irrigated with water is less than 50 hectares and 10 percent of the property ; and	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-413	Moir Farms Maimai Limited	Delete Rule 15B.5.14(2) and replace with a percentage of farms with irrigation rather than 50 hectare value.		
PC5LWRP-413A	Moir Farms Maimai Limited	Delete Rule 15.B.5.14(3) and replace with a percentage of farms that can have winter crops grazed.		
PC5LWRP-1090	Giles M	Delete Rule 15B.5.14(3) and replace with assessment based on Good Management Practice and the Farm Portal.		
PC5LWRP-1525A	Beef and Lamb New Zealand Ltd	Amend Rule 15B.5.14(3) as follows: 3. The area of any property used for winter grazing within the period 1 May to 1 September does not exceed a total of ~~20~~50 hectares and 10% of the property ; and…		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-430	Forrester M and G	Amend 15B.5.14(3) by replacing the reference to 20 hectares with a percentage of the total farmed area, e.g. 10% for winter crops.		
PC5LWRP-1454	Hurunui SNA Group & Rural Advocacy	Amend Rule 15B.5.14(3) to exclude the reference to 20 hectares, and manage intensive grazing cattle either by: 1) the use of voluntary farm plans and education OR 2) permit winter grazing so long as it meets practical farmer agreed GMPs.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-453	DairyNZ	Delete Rule 15B.5.14(4).	Reject	The omission of this condition of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2575A	Federated Farmers of New Zealand	Delete Rule 15B.5.14(4) and replace with: 4. All farming activities to achieve Industry GMP by 30 June 2020.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2178A	Ravensdown Limited	Amend Rule 15B.5.14(4) to read: 4. For any property with an area less than 50 hectares of irrigation or 20 hectares of winter grazing as at 13 February 2016, there is no increase in the area of land that is irrigated with water ~~or used for winter grazing~~ beyond the area of land that was irrigated ~~or used for winter grazing~~ as at 13 February 2016; and…		
PC5LWRP-1924	Forest and Bird NZ	Amend Rule 15B.5.14 to include a new condition 6: The farming activities operates at or below the Good Management Practise Loss Rate, in any circumstance where that Good Management Practise Loss Rate is less than the Baseline GMP Loss Rate.		
PC5LWRP-923	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.14 to include an additional condition as follows: The nitrogen loss calculation for the property does not exceed 15kgs per year; and	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. Consequential changes are recommended as appropriate. See Chapter 11 of this report.

Rule 15B.5.15 (now recommended Rule 15B.5.14)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2174	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.15.	Accept	We agree that retaining a controlled activity classification is appropriate.
PC5LWRP-1375	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.15, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1925	Forest and Bird NZ	Delete Rule 15B.5.15.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2174A	Ravensdown Limited	Amend Rule 15B.5.15 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled;	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		• Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-2577	Federated Farmers of New Zealand	Amend Rule 15B.5.15 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].		
PC5LWRP-2695	Killermont Station 2012 Limited	Amend Rule 15B.5.15 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2703	Twinburn Ltd	Amend Rule 15B.5.15 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2782	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.		
PC5LWRP-2741	Director General of Conservation	Amend Rule 15B.5.15 as follows: Change the activity status to restricted discretionary activity; And further or alternative relief to like effect to that sought.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-2174B	Ravensdown Limited	Amend Rule 15B.5.15(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor. Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-82	Meridian Energy Limited	Amend Rule 15B.5.15(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Ahuriri Zone or Upper Waitaki Hill Zone does not exceed the nitrogen baseline, and from 1 July 2020 the lesser of the Nitrogen Baseline or Baseline GMP Loss Rate; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful; and Or any decisions of similar effect.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-1651	Fertiliser Association of New Zealand	Amend Rule 15B.5.15(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-454	DairyNZ	Amend Rule 15B.5.15(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Ahuriri Zone or Upper Waitaki Hill Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate or 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 ~~; and~~ Or words to similar effect.		
PC5LWRP-1994	Genesis Energy Limited	Amend Rule 15B.5.15(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Ahuriri Zone or Upper Waitaki Hill Zone does not exceed the nitrogen baseline, and from 1 July 2020 the lesser of the Nitrogen Baseline or Baseline GMP Loss Rate; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful; and Or any decisions of similar effect.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-454A	DairyNZ	Delete Rule 15B.5.15(3).	Reject	The omission of this condition of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2577A	Federated Farmers of New Zealand	Delete Rule 15B.5.15(3).		objectives and for giving effect to the superior instruments.
PC5LWRP-2174C	Ravensdown Limited	Amend Rule 15B.5.15(3) to read: 3) The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-454B	DairyNZ	Amend Rule 15B.5.15(4) as follows: (4) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-454C	DairyNZ	Amend Rule 15B.5.15(5) as follows: (5) Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate ; and... Or words to similar effect.		
PC5LWRP-454D	DairyNZ	Amend Rule 15B.5.15 by adding the following additional matter of control: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	Conditions 1 and 3 of this rule already address this matter.
PC5LWRP-2741A	Director General of Conservation	Amend Rule 15B.5.15 by adding the following additional matter of control: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2741B	Director General of Conservation	Amend Rule 15B.5.15 by adding the following additional matter of control: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.		
PC5LWRP-925	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.15 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	See Chapter 10 of this report.
PC5LWRP-2577B	Federated Farmers of New Zealand	Amend Rule 15B.5.15 by adding the following additional matter of control: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	Matters of control 3, 4 and 5 already allow for consideration of this issue.

Rule 15B.5.16 (now recommended Rule 15B.5.15)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2180	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.16.	Accept	We agree that retaining a restricted discretionary classification is appropriate.
PC5LWRP-2371	Federated Farmers of New Zealand	Delete Rule 15B.5.16.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1376	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.16, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2180A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.16 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-2748	Director General of Conservation	Amend Rule 15B.5.16 to change the activity status to a fully discretionary activity if the relief in submission point PC5LWRP-2748A and PC5LWRP-2748B are not accepted.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2783	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.		
PC5LWRP-2696	Killermont Station 2012 Limited	Amend Rule 15B.5.16 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2704	Twinburn Ltd	Amend Rule 15B.5.16 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-1926	Forest and Bird NZ	Amend Rule 15B.5.16 to replace reference to condition 3 of Rule 15B.5.15 with Rule 5.54 (as amended).	Reject	We are recommending that Rule 5.54 is omitted.
PC5LWRP-2065	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.16 as follows: Within the Ahuriri Zone or Upper Waitaki Hill 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 or 3 of Rule 15B.5.15 is a restricted discretionary activity provide the following conditions are met: AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2180B	Ravensdown Limited	Amend Rule 15B.5.16(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor. Or such other or alternative wording which would properly address the concerns raised	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1652	Fertiliser Association of New Zealand	Amend Rule 15B.5.16(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-83	Meridian Energy Limited	Amend Rule 15B.5.16(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Ahuriri Zone or Upper Waitaki Hill Zone does not exceed the Nitrogen Baseline, and from 1 July 2020 the lesser of the Nitrogen Baseline or Baseline GMP Loss Rate; unless the Nitrogen Baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful. Or words to similar effect.		economic growth and employment.
PC5LWRP-462	DairyNZ	Amend Rule 15B.5.16(2) as follows: (2) ~~Until 30 June 2020, t~~The nitrogen loss calculation for the part of the property within the Ahuriri Zone or Upper Waitaki Hill Zone does not exceed ~~the nitrogen baseline, and from 1 July 2020~~ the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP from 1 July 2020; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2004	Genesis Energy Limited	Amend Rule 15B.5.16 (2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Ahuriri Zone or Upper Waitaki Hill Zone does not exceed the nitrogen baseline, and from 1 July 2020 the lesser of the Nitrogen Baseline or Baseline GMP Loss Rate; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful. Or any decisions of similar effect.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-2065A	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.16(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Ahuriri Zone or Upper Waitaki Catchment Zone does not exceed the nitrogen baseline, and from 1 July 2020 the ~~Baseline GMP Loss Rate~~Loss Rate Assessed as GMP Baseline; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016; and the application for resource consent demonstrates that the exceedance was lawful. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1926A	Forest and Bird NZ	Amend to include a new condition: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan notified after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity located on the application area, and proposes methods to avoid or mitigate any adverse effects on significant indigenous biodiversity.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-462A	DairyNZ	Amend Rule 15B.5.16 Matters of Discretion as follows: *5.* Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-462B	DairyNZ	Amend Rule 15B.5.16 Matters of Discretion as follows: *6. Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and* Or words to similar effect.		
PC5LWRP-2748A	Director General of Conservation	Amend Rule 15B.5.16 by adding the following matter of control: 3. Methods to protect significant indigenous terrestrial biodiversity and habitat until the	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		requirements of Policy 15B.4.23 (b) are met, and		achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2748B	Director General of Conservation	Amend Rule 15B.5.16 by adding the following matter of control: 4. Methods to protect significant indigenous freshwater biodiversity and habitat.		
PC5LWRP-928	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.16 to include an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	See Chapter 10 of this report.
PC5LWRP-1926B	Forest and Bird NZ	Amend Rule 15B.5.16 to include a matter of discretion: Until biodiversity provisions in a district plan are notified post 13 February 2016, the extent to which the proposal avoids or mitigates any adverse effects on any areas of significant indigenous biodiversity.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2065B	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.16 to include a matter of discretion: The estimation of the Loss Rate Assessed as GMP Baseline. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Rule 15B.5.17 (now recommended Rule 15B.5.16)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1927	Forest and Bird NZ	Retain Rule 15B.5.17 as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-301	DairyNZ	Amend Rule 15B.5.17 as follows: Within the Ahuriri Zone or Upper Waitaki Hill Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not comply with condition 1 or condition 2 of Rule 15B.5.15 or condition 1 or condition 2 of Rule 15B.5.16, or the use of land for a farming activity as part of a farming enterprise that does not comply with conditions 1 , 2 or 3 of Rule 5.46A, is a non-complying activity. Or words to similar effect.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1655	Fertiliser Association of New Zealand	Amend Rule 15B.5.17 from a non complying activity to a discretionary activity.		
PC5LWRP-2183	Ravensdown Limited	Amend Rule 15B.5.17 from a non complying activity to a discretionary activity.		
PC5LWRP-2697	Killermont Station 2012 Limited	Amend Rule 15B.5.17 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2705	Twinburn Ltd	Amend Rule 15B.5.17 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2784	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first.		

Rule 15B.5.18 (now recommended Rule 15B.5.17)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1928	Forest and Bird NZ	Retain Rule 15B.5.18 as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-497	DairyNZ	Delete Rule 15B.5.18 and farming activities which do not meet condition 2 of Rule 15B.5.15, or condition 2 of Rule 15B.5.16, or condition 2 of Rule 5.46A default to a non-complying activity under Rule15B.5.17.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1656	Fertiliser Association of New Zealand	Amend Rule 15B.5.18 from a prohibited activity to a discretionary activity. OR Amend to combine with Rule 15B.5.17 as a discretionary activity.		
PC5LWRP-2184	Ravensdown Limited	Amend Rule 15B.5.18 from a prohibited activity to a discretionary activity		
PC5LWRP-2581A	Federated Farmers of New Zealand	Amend Rule 15B.5.18 from a prohibited activity to a non complying activity.		
PC5LWRP-2184A	Ravensdown Limited	Amend to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2581	Federated Farmers of New Zealand	Amend Rule 15B.5.18 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].		
PC5LWRP-1462	Mackenzie Irrigation Company Ltd	Amend Rule 15B.5.18 to explain clearly that if any nutrient headroom was to become available (due to the lake's TLI levels reducing), it would first be available to the low emitters.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2698	Killermont Station 2012 Limited	Amend Rule 15B.5.18 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2706	Twinburn Ltd	Amend Rule 15B.5.18 to ensure that if any nutrient headroom became available (due to lake's TLI level reducing) it would first be available to the low emitters.		
PC5LWRP-2785	Becker M	Amend Rules 15B.5.13A-15B.5.18 to achieve 'nutrient headroom' allocation being made available to low emitters first		

Haldon Zone and Mid Catchment Zone Rules

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1507	Mackenzie Irrigation Company Ltd	Amend Haldon and Mid Catchment Zone rules to ensure the Upper Waitaki Headroom is split equally across dryland areas of a property and not allocated on a first in first served basis.	Accept in part	We are recommending amendments to notified Rule 15B.5.18B to clarify that the allocation of 1.6kg of nitrogen per hectare is only an allocation to that part of the property that is not irrigated.

Rule 15B.5.18A (now recommended Rule 15B.5.18)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1657	Fertiliser Association of New Zealand	Retain Rule 15B.5.18A as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2185	Ravensdown Limited	Retain Rule 15B.5.18A as notified		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2373	Federated Farmers of New Zealand	Retain Rule 15B.5.18A as notified.		
PC5LWRP-1437	Glentanner Station Limited	Amend Rule 15B.5.18A to include permitted activity status for irrigation water permits that were not granted or commenced before 13 February 2016.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report. Consequential changes are recommended as appropriate.
PC5LWRP-2001	Bellfield Land Co Ltd	Amend Rule 15B.5.18A to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Reject	Other amendments we are recommending substantially address this issue.
PC5LWRP-922	Killermont Station 2012 Limited	Amend Rule 15B.5.18A(3)(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity rule] is required for consents after this date with [an] NDA.		
PC5LWRP-975	Rietveld J A	Amend Rule 15B.5.18A(3)(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity status] is sought for consents after this date with [an] NDA.		
PC5LWRP-1108	Twinburn Ltd	Amend Rule 15B.5.18A(3)(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity rule] is required for consents after this date with [an] NDA.		
PC5LWRP-1127	Haldon Station Limited	Amend Rule 15B.5.18A(3)(a), or add an additional rule to provide for change of conditions/new consents providing an existing consented NDA is applied to the change of conditions or new consent after 13 February 2016. A permitted [activity rule] is required for consents after this date with [an] NDA.		
PC5LWRP-1506	Mackenzie Irrigation Company Ltd	In Rule 15B.5.18A(3)(a) clarify what the date of consents granted prior to 13 February 2016 means for any subsequent variations or replacements to consents that occur after this date. The submitter states that a non-complying status is inappropriate.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-922A	Killermont Station 2012 Limited	Clarify intent of Rule 15B.5.18A(3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-975A	Rietveld J A	Clarify intent of Rule 15B.5.18A(3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1108A	Twinburn Ltd	Clarify intent of Rule 15B.5.18A(3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1127A	Haldon Station Limited	Clarify intent of Rule 15B.5.18A(3)(b), and amend [the rule] to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-2001A	Bellfield Land Co Ltd	The submitter seeks clarification of Rule 15B.5.18A(3)(b) and seeks to amend the rule to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1534A	Mackenzie Irrigation Company Ltd	Explain the intention of commencement of consents granted or in appeal rather than physically irrigating to ensure those whom are still in appeal or have not commenced irrigation yet are not precluded from being permitted activities.		
PC5LWRP-1534	Mackenzie Irrigation Company Ltd	Insert new rule so that new consents after the 13 February 2016, provided that they have an existing consented Nitrogen Discharge Allowance (NDA), are a permitted activity.	Accept in part	In response to this submission we are recommending amendments to other rules to the general effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Rule 15B.5.18B (now recommended Rule 15B.5.19)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2186	Ravensdown Limited	Retain the restricted discretionary status of Rule 15B.5.18B.	Accept	We agree that restricted discretionary classification is appropriate.
PC5LWRP-1379	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.18B, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2749	Director General of Conservation	Amend Rule 15B.5.18B to change the activity status to a fully discretionary activity if the relief sought in submission points PC5LWRP2749A and PC5LWRP2749B is not accepted; And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1658	Fertiliser Association of New Zealand	Amend Rule 15B.5.18B to shift the onus back to regional and district council to identify areas of significant indigenous biodiversity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2579	Federated Farmers of New Zealand	Amend Rule 15B.5.18B to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-976	Rietveld J A	Amend Rule 15B.5.19 to ensure that the Upper Waitaki Nitrogen Headroom is split equally only between dry land areas of farm as per the methodology in Schedule 27.	Accept in part	We are recommending amendments to rules in Plan Change 5 to clarify that the allocation of 1.6kg of nitrogen per hectare is only an allocation to that part of the property that is not irrigated.
PC5LWRP-1128	Haldon Station Limited	Amend Rule 15B.5.19 to ensure that the Upper Waitaki Nitrogen Headroom is split equally only between dry land areas of farm as per the methodology in Schedule 27.		
PC5LWRP-1197	West Edge	Amend Rule 15B.5.18B to achieve a process whereby the allocation of available headroom is allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment. Submitter is opposed to the 1.6 kg/ha/yr allocation limit placed on the Haldon zone.	Reject	Provisions in Schedule 27 already address these matters
PC5LWRP-1292	Ellis-Lea Farm	Amend Rule 15.5.18B to achieve a process whereby the allocation of available headroom is allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment.		
PC5LWRP-1301	Benmore Station	Amend Rule 15.5.18B to achieve a process whereby the allocation of available headroom is		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment.		
PC5LWRP-1232	Benmore Irrigation Company Ltd - Shepherd B	Submitter requests changes to 1.6kg/ha/yr allocation limit placed on the Haldon Zone. Amend Rule 15.5.18B to achieve a process whereby the allocation of available headroom is allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment.		
PC5LWRP-1253	Twizel Dairy	Amend Rule 15.5.18B to achieve a process whereby the allocation of available headroom is allocated by successive resource consents, with the Regional Council keeping a public register on the current state of headroom allocation in the Haldon Catchment. Submitter is opposed to the 1.6 kg/ha/yr allocation limit placed on the Haldon zone.		
PC5LWRP-2186A	Ravensdown Limited	Amend Condition 1 to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2579A	Federated Farmers of New Zealand	Delete Rule 15B.5.18B(3).	Reject	The omission of this condition of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-377	Mackenzie District Council	Amend Rule 15B.5.18B(3) as follows: Except where areas of significant indigenous biodiversity on the property have been identified and maintained in accordance with the relevant provisions of any district plan ~~notified~~that are notified and take legal effect after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity located on the application area, and proposes methods to ~~avoid or mitigate any adverse effects on significant~~ensure no net loss of indigenous biodiversity.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-372	Mackenzie District Council	Amend Rule 15B.5.18B matter of discretion (7) as follows: The actual or potential adverse effects of the proposal~~methods to avoid or mitigate adverse effects of the activity~~ on surface and groundwater quality and sources of drinking water; and	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-380	Mackenzie District Council	Amend Rule 15B.5.18 matter of discretion (10) as follows: Until ~~provisions in a district plan~~the district plan provisions referred to in Policy 15B.4.23(a)~~are notified~~take legal effect post 13 February 2016, ~~the extent to which~~whether the proposal ~~avoids or mitigates any adverse effects on any areas~~ensures no net loss of significant indigenous biodiversity.	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-2749A	Director General of Conservation	Amend Rule 15B.5.18B by adding the following matter of discretion: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and And further or alternative relief to like effect to that sought.	Reject	Matter of discretion 10 already allows for consideration of this matter.
PC5LWRP-2749B	Director General of Conservation	Amend Rule 15B.5.18B by adding the following matters of discretion: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.		

Rule 15B.5.18C (now recommended Rule 15B.5.20)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1660	Fertiliser Association of New Zealand	Amend Rule 15B.5.18C from a non complying activity to a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2375	Federated Farmers of New Zealand	Amend Rule 15B.5.18C from a non complying activity to a discretionary activity.		
PC5LWRP-2189	Ravensdown Limited	Amend activity status of Rule 15B.5.18C from a non complying activity to a restricted discretionary activity, with Council restricting its discretion to the conditions of Rule 15B.5.18B that are not met.		
PC5LWRP-1538	Mackenzie Irrigation Company Ltd	Amend Rule 15B.5.18C to explain clearly and robustly the intention of Haldon Arm headroom allocated for dryland farm areas in relation to Schedule 27 to ensure this headroom is equally split to dry land areas meeting the definition.	Accept in part	We are recommending amendments to rules in Part B of Plan Change 5 to clarify that the headroom is only an allocation to that part of the property that is not irrigated.

Rule 15B.5.19 (now recommended Rule 15B.5.21)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2190	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.19.	Accept	We agree that retaining the controlled activity classification is appropriate.
PC5LWRP-1380	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.19, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information. And make any consequential amendments.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1929	Forest and Bird NZ	Delete Rule 15B.5.19.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2190A	Ravensdown Limited	Amend Rule 15B.5.19 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. With regard to the request to embed the GMP Loss Rate within the FEP, see Chapter 14 of this report.
PC5LWRP-1325	Pukaki Tourism Holdings LP	Amend Rule 15B.5.19 to allow the lawful exceedance of the nitrogen baseline to occur after the 13 February 2016 in special circumstances i.e. the control of invasive pest species such as wilding pine- AND To allow consents to be applied for to further exceed the baseline and lawful exceedance in special circumstances.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2376	Federated Farmers of	Amend Rule 15B.5.19 to provide an alternative pathway for farm systems and individual	Accept in part	These submissions request provision in Plan Change 5 for an

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand	situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].		alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-2709	Rietveld J A	Amend Rule 15B.5.19 to ensure that the Upper Waitaki Nitrogen Headroom is split equally only between dry land areas of farm as per the methodology in Schedule 27.	Accept in part	We are recommending amendments to rules in Part B of Plan Change 5 and the formula in Schedule 27 to clarify that the Upper Waitaki Headroom is only an allocation to that part of the property that is not irrigated.
PC5LWRP-1268	Haldon Station Limited	Amend Rule 15B.5.19 to ensure that the Upper Waitaki Nitrogen Headroom is split equally only between dry land areas of farm as per the methodology in Schedule 27.		
PC5LWRP-1544	Mackenzie Irrigation Company Ltd	Amend Rule 15B.5.19 to ensure that the Upper Waitaki Nitrogen Headroom is split equally only between dry land areas of farm as per the methodology in Schedule 27.		
PC5LWRP-2742	Director General of Conservation	Amend Rule 15B.5.19 as follows: Change the activity status to restricted discretionary activity.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2190B	Ravensdown Limited	Amend Rule 15B.5.19(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.		
PC5LWRP-498	DairyNZ	Amend Rule 15B.5.19(2) as follows: 2. Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Haldon Zone or Mid Catchment Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate or 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 ~~; and~~	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1663	Fertiliser Association of New Zealand	Amend Rule 15B.5.19(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.		
PC5LWRP-498A	DairyNZ	Delete Rule 15B.5.19(3).	Reject	The omission of this condition of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2376A	Federated Farmers of New Zealand	Delete Rule 15B.5.19(3).		
PC5LWRP-2190C	Ravensdown Limited	Amend Rule 15B.5.19(3) to read: 3) The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-498B	DairyNZ	Amend Rule 15B.5.19 matter of control (4) as follows: 4. Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-498C	DairyNZ	Amend Rule 15B.5.19 matter of control (5) as follows: 5. Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate; and		
PC5LWRP-374	Mackenzie District Council	Amend Rule 15B.5.19 matter of control (6) as follows: (6) Methods to avoid adverse effects on sources of drinking water and avoid or mitigate adverse effects of the activity on surface and groundwater quality ~~and sources of drinking~~	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		~~water~~		the superior instruments.
PC5LWRP-498D	DairyNZ	Amend Rule 15B.5.19 by adding the following additional matter of control: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-929	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.19 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	See Chapter 10 of this report.
PC5LWRP-2376B	Federated Farmers of New Zealand	Amend Rule 15B.5.19 to include a matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	Matters of control 2, 3, 4 and 5 already allow for consideration of this matter.
PC5LWRP-2742A	Director General of Conservation	Amend Rule 15B.5.19 to include a matter of control as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2742B	Director General of Conservation	Amend Rule 15B.5.19 to include a matter of control as follows: Methods to protect significant indigenous freshwater biodiversity and habitat And further or alternative relief to like effect to that sought.		

Rule 15B.5.20 (now recommended Rule 15B.5.22)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2192	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.20.	Accept	We agree that retaining a restricted discretionary classification is appropriate.
PC5LWRP-2750	Director General of Conservation	Amend Rule 15B.5.20 to change the activity status to a fully discretionary activity if the relief sought in submission points PC5LWRP-2750A and PC5LWRP-2750B is not accepted.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1382	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.20, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2192A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.20 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-1662	Fertiliser Association of	Amend Rule 15B.5.20 to shift the onus back to regional and district council to identify areas of	Reject	We adopt the recommendations and reasons set out in the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand	significant indigenous biodiversity.		Section 42A Report.
PC5LWRP-977	Rietveld J A	Amend Rule 15B.5.20 to ensure that the Upper Waitaki Nitrogen Headroom is split equally (not first in first served) to dry land areas based on Schedule 27.	Accept in part	We are recommending amendments to rules in Part B of Plan Change 5 and the formula in Schedule 27 to clarify that the Upper Waitaki Headroom is only an allocation to that part of the property that is not irrigated.
PC5LWRP-1129	Haldon Station Limited	Amend Rule 15B.5.20 to ensure that the Upper Waitaki Nitrogen Headroom is split equally (not first in first served) to dry land areas based on Schedule 27.		
PC5LWRP-1545	Mackenzie Irrigation Company Ltd	Amend Rule 15B.5.20 to explain clearly and robustly the intention of Haldon Arm headroom allocated for dryland farm areas in relation to Schedule 27 to ensure this headroom is equally split to dry land areas meeting the definition.		
PC5LWRP-1930	Forest and Bird NZ	Amend Rule 15B.5.20 to replace reference to condition 2 of Rule 15B.5.19 with Rule 5.53.	Reject	We are recommending omitting Rule 5.53.
PC5LWRP-2192B	Ravensdown Limited	Amend Rule 15B.5.20(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor. Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-72	Meridian Energy Limited	Amend Rule 15B.5.20 (2) as follows: (2) the nitrogen loss calculation for the property does not exceed the Upper Waitaki Nitrogen Headroom available to the property and does not result in the total Nitrogen Headroom for all farming properties within the Zone, calculated in accordance with Schedule 27, being exceeded ; and	Accept in part	We are recommending other amendments to the formula in Schedule 27 to ensure the headroom is not exceeded.
PC5LWRP-1776	Genesis Energy Limited	Amend Rule 15B.5.20 (2) as follows: (2) The nitrogen loss calculation for the property does not exceed the Upper Waitaki Nitrogen Headroom available to the property and does not result in the total Nitrogen Headroom for all farming properties within the Zone, calculated in accordance with Schedule 27, being exceeded ;		
PC5LWRP-499	DairyNZ	Amend Rule 15B.5.20(2) as follows: (2) The nitrogen loss calculation for the property does not exceed the Upper Waitaki Nitrogen Headroom available to the property ~~; and~~	Reject	We do not consider the omission of the word 'and' is appropriate.
PC5LWRP-760	Central South Island Fish and Game Council	Amend Rule 15B.5.20(2) as follows: (2) The nitrogen loss calculation for the property does not exceed the Upper Waitaki Nitrogen Headroom available to the property, which is calculated from the Nitrogen load limits in Table 15B(f).		
PC5LWRP-2069	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.20 (2) to clarify if the intent is: (2) The nitrogen loss calculation for the property [~~*does not exceed*~~] would not cause, the Upper Waitaki Headroom [~~*available to the property*~~] to be exceeded. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-499A	DairyNZ	Delete Rule 15B.5.20(3).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2379	Federated Farmers of New Zealand	Delete Rule 15B.5.20(3).		
PC5LWRP-379	Mackenzie District Council	Amend Rule 15B.5.20(3) as follows: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan ~~notified~~that are notified and take legal effect after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		significant indigenous biodiversity located on the application area, and proposes methods ~~avoid or mitigate any adverse effects on~~ ensure no net loss of significant indigenous biodiversity.		
PC5LWRP-932	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.20 matter of discretion (3) as follows: The potential adverse effects of the activity on mahinga kai and the ability to exercise kaitiakitanga; and	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-932A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.20 matter of discretion (4) as follows: The potential adverse effects of the activity on wāhi tapu or wāhi taonga ~~identified in an iwi management plan~~ ; and	Accept	We agree that omitting this part of the matter of discretion is appropriate and recommend consequential amendments to Policy 15B.4.1.
PC5LWRP-371	Mackenzie District Council	Retain Rule 15B.5.20 matter of discretion (5).	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-499B	DairyNZ	Amend Rule 15B.5.20 matter of discretion (8) as follows: Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Upper Waitaki Headroom available for the property; and	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-499C	DairyNZ	Amend Rule 15B.5.20 matter of discretion (10) as follows: Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council ~~; and~~	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-382	Mackenzie District Council	Amend Rule 15B.5.20 matter of discretion (11) as follows: Until the district plan provisions referred to in Policy 15B.4.23(a)~~biodiversity provisions in a district plan are notified~~take legal effect post 13 February 2016, ~~the extent to which~~whether the proposal ~~avoids or mitigates any adverse effects on any areas~~ensures no net loss of significant indigenous biodiversity.	Accept in part	In response to this and other submissions we recommend some amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-499D	DairyNZ	Delete Rule 15B.5.20 matter of discretion (11).	Reject	The omission of this matter of discretion from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2750A	Director General of Conservation	Amend Rule 15B.5.20 by adding the following matter of discretion: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and And further or alternative relief to like effect to that sought.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2750B	Director General of Conservation	Amend Rule 15B.5.20 by adding the following matter of discretion: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.		
PC5LWRP-72A	Meridian Energy Limited	Amend Rule 15B.5.20 by adding the following matter of control: That the total of the Upper Waitaki Nitrogen Headroom for all farming activities within the Haldon Zone or Mid- Catchment Zone is not exceeded; and Or words to the similar effect.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1776A	Genesis Energy Limited	Amend Rule 15B.5.20 by adding the following matter of control: That the total of the Upper Waitaki Nitrogen Headroom for all farming activities within the Haldon Zone or mid Catchment Zone is not exceeded; and Or any decisions of similar effect.		
PC5LWRP-72B	Meridian Energy Limited	Amend Rule 15B.5.20 by adding the following matter of control: That the calculated nitrogen loss from the farming activity, in combination with calculated nitrogen losses from all other farming activities in the Zone, does not result in the relevant Nitrogen Load Limits set out in Table 15B(f) being exceeded; and Or words to the similar effect.		
PC5LWRP-1776B	Genesis Energy Limited	Amend Rule 15B.5.20 by adding the following matter of control: That the calculated nitrogen loss from the farming activity, in combination with calculated nitrogen losses from all other farming activities does not result in the relevant Nitrogen Load Limits set out in Table 15B(f) being exceeded; and… Or any decisions of similar effect.		
PC5LWRP-932B	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.20 by adding the following matter of control: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	See Chapter 10 of this report.

Rule 15B.5.21 (now recommended Rule 15B.5.23)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1665	Fertiliser Association of New Zealand	Retain Rule 15B.5.21 as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-2381	Federated Farmers of New Zealand	Retain Rule 15B.5.21 as notified.		
PC5LWRP-2193	Ravensdown Limited	Retain the discretionary activity status of Rule 15B.5.21;	Accept	We agree that retaining a discretionary activity classification for this rule is appropriate.
PC5LWRP-1384	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.21, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2193A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.21 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-500	DairyNZ	Amend Rule 15B.5.21 to provide for a Restricted Discretionary consent pathway, with Matters	Reject	We are not persuaded that the amendment requested would

		for Discretion similar to those outlined in PC5LWRP-499 (Rule 15B.5.20).		be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2193B	Ravensdown Limited	Amend Rule 15B.5.21(1) of to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor; Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-74	Meridian Energy Limited	Amend Rule 15B.5.21(2) as follows: 2) the nitrogen loss calculation for the farming enterprise does not exceed the sum of the Upper Waitaki Nitrogen Headroom available to the properties forming the farming enterprise ~~;~~and does not result in the total Headroom for all farming properties in the Zone, calculated in accordance with Schedule 27, being exceeded; and Or words to the same effect.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-762	Central South Island Fish and Game Council	Amend Rule 15B.5.21(2) as follows: (2) The nitrogen loss calculation for the farming enterprise does not exceed the ~~the~~ sum of the Upper Waitaki Nitrogen Headroom available to the properties forming the farming enterprise ~~,~~ which is calculated from the Nitrogen load limits in Table 15B(f) ; and		
PC5LWRP-1777	Genesis Energy Limited	Amend Rule 15B.5.21(2) as follows 2. The nitrogen loss calculation for the farming enterprise does not exceed the sum of the Upper Waitaki Nitrogen Headroom available to the properties forming the farming enterprise ~~;~~and does not result in the total Nitrogen Headroom for all farming properties in the Zone, calculated in accordance with Schedule 27, being exceeded; and Or any decisions of similar effect.		
PC5LWRP-1931	Forest and Bird NZ	Delete Rule 15B.5.21(2).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2163	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.21 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate that will not cause the applicable load limit calculated in accordance with Schedule 27 to be exceeded; and 6. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 7. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 8. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 9. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.

		the relief sought.		

Rule 15B.5.22 (now recommended Rule 15B.5.24)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1932	Forest and Bird NZ	Retain Rule 15.B.5.22 as notified.	Accept	We agree that retaining this rule is appropriate.
PC5LWRP-501	DairyNZ	Amend Rule 15B.5.22 as follows: Within the Haldon Zone or Mid Catchment Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not meet condition 1 or 3 of 15B.5.19, or condition 1 , 2 or 3 of Rule 15B.5.20, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 1 , 2 or 3 of Rule 15B.5.21, is a non-complying activity. Or words to similar effect.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1666	Fertiliser Association of New Zealand	Amend Rule 15B.5.22 from a non complying activity to a discretionary activity.		
PC5LWRP-2194	Ravensdown Limited	Amend Rule 15B.5.22 from a non-complying activity to a discretionary activity.		
PC5LWRP-2384	Federated Farmers of New Zealand	Amend Rule 15B.5.22 from a non complying activity to a discretionary activity.		

Rule 15B.5.23 (now recommended Rule 15B.5.25)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1933	Forest and Bird NZ	Retain Rule 15.B.5.23 as notified.	Accept	We agree that retaining this rule is appropriate.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-502	DairyNZ	Delete Rule 15B.5.23.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-1668	Fertiliser Association of New Zealand	Amend Rule 15B.5.23 from a prohibited activity to a discretionary activity. OR Amend to combine with Rule 15B.5.22 as a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2195	Ravensdown Limited	Amend Rule 15B.5.23 from a prohibited activity to a discretionary activity;		
PC5LWRP-2385	Federated Farmers of New Zealand	Amend Rule 15B.5.23 from a prohibited activity to a non complying activity.		
PC5LWRP-2195A	Ravensdown Limited	Amend to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Rule Hakataramea River Zone and Hill Zone

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1102	White K A	Supports restrictions on farming in the Hakataramea River Zone.	Accept in part	We note the support for these restrictions.
PC5LWRP-2737	C/- Greg Nelson MFS Ventures Ltd	Submitter has concerns around the accuracy of the mapping for the Hakataramea River Zone.	Reject	We are not persuaded that the maps are inaccurate to a degree that renders them unfit for purpose.
PC5LWRP-2738	Harding A D	Submitter has concerns that the Hakataramea River Zone rule framework allows for intensive activities.	Accept in part	We note the concern raised by the submitter.

Rule 15B.5.24

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-763	Central South Island Fish and Game Council	Retain Rule 15B.5.24 as notified.	Accept in part	We adopt the recommendations in the Section 42A Report to omit this rule but to incorporate the content of this rule into new Rule 15B.5.13. We recommend some amendments to the content of the notified provisions to address matters raised by other submissions.
PC5LWRP-1934	Forest and Bird NZ	Retain Rule 15.B.5.24 as notified.		
PC5LWRP-1385	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.24, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	We adopt the recommendations in the Section 42A Report to omit this rule but to incorporate the content of this rule into new Rule 15B.5.13. Further we are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-118	Bellfield Land Co Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing. AND	Reject	We adopt the recommendations in the Section 42A Report to omit this rule but to incorporate the content of this rule into new Rule 15B.5.13. Further, for the reasons set out in the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		Section 42A Report, we recommend restricting the area of a property that may be used for winter grazing within the Hakataramea Hill Zone and Hakataramea River zone to 20 hectares.
PC5LWRP-962	Killermont Station 2012 Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1004	Rietveld J A	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1122	Twinburn Ltd	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-1143	Haldon Station Limited	Amend the permitted activity thresholds from narratives to percentages - for example 25% irrigated and 10% winter grazing.		
PC5LWRP-2628	Waitaki Irrigators Collective Ltd	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing. Submitter seeks new rule framework in Part B - Section 15B [refer to PC5LWRP-790] and requests that region-wide rules be amended to this effect.		
PC5LWRP-2633	Kakahu Catchment Group	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-2642	Craigmore Farming	Amend permitted activity thresholds to percentages of total farm size, specifically 25% for irrigation and 10% for winter grazing.		
PC5LWRP-1446	Mackenzie Irrigation Company Ltd	Amend Rule 15B.5.24 to exclude the use of narratives and instead use a percentage of the total farm area.		
PC5LWRP-478	Ballance Agri-Nutrients Limited	Amend Rule 15B.5.24(1) as follows: ...and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24 months~~36 months thereafter, unless there is a material change to the farm system ; and	Accept in part	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13. We recommend an amendments to the notified provisions to give effect to the relief sought in these submission points.
PC5LWRP-1670	Fertiliser Association of New Zealand	Amend Rule 15B.5.24(1) as follows: 1. The property is registered in the Farm Portal by 1 July 20 ~~17~~18 and information about the farming activity and the property is reviewed and updated by the property owner or their agent, every ~~24~~36 months thereafter or upon a significant farm system change ; and..		
PC5LWRP-2766	Moir Farms Maimai Limited	Delete Rule 15B.5.24(2) and replace with a percentage of farms with irrigation rather than 50 hectare value	Reject	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13. Further, we adopt the recommendations and reasons set out in the Section 42A Report for restricting the area of the property used for winter grazing to 20 hectares.
PC5LWRP-2613	Federated Farmers of New Zealand	Amend Rule 15B.5.24 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	We adopt the recommendations in the Section 42A Report to omit this rule but to incorporate the content of this rule into new Rule 15B.5.13. However, in response to this and other submissions we are recommending amendments to Plan Change 5 that allows, in limited circumstances, an alternative to the Farm Portal for calculating a Baseline GMP Loss Rate and Good Management Practice Loss Rate.
PC5LWRP-2196	Ravensdown Limited	Amend Rule 15B.5.24 (2) as follows: 2. No ~~part~~more than 50 ha of the property within the Hakataramea River Zone or Hakataramea Hill Zone is irrigated with water; and	Accept in part	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13. However, in response to this and other

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-503	DairyNZ	Amend Rule 15B.5.24(2) as follows: 2. No ~~part~~ more than 50 ha of the property within the Hakataramea River Zone or Hakataramea Hill Zone is irrigated with water; and		submissions, and for the reasons set out in submissions and evidence, we recommend amendments to the notified provisions of PC5 to permit up to 50 hectares of irrigation on any property within the Hakataramea River Zone and Hakataramea Hill Zone.
PC5LWRP-2653	Forrester M and G	Delete Rule 15B.5.24(3) and replace with a percentage of the total farmed area, e.g. 10% for winter crops.	Accept in part	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13. Further, we adopt the recommendations and reasons set out in the Section 42A Report for restricting the area of the property used for winter grazing to 20 hectares.
PC5LWRP-2766A	Moir Farms Maimai Limited	Delete Rule 15B.5.24(3) and replace with a percentage of farms that can have winter crops grazed.	Reject	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13. We adopt the recommendations and reasons set out in the Section 42A Report for restricting the area of the property used for winter grazing to 20 hectares.
PC5LWRP-1093	Giles M	Delete Rule 15B.5.24(3) and replace with assessment based on Good Management Practice and the Farm Portal.	Accept in part	
PC5LWRP-1675	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-931	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.24 to include an additional condition as follows: The nitrogen loss calculation for the property does not exceed 15kgs per year; and	Reject	We adopt the recommendations and reasons set out in the Section 42A Report. See Chapter 11 of this report.
PC5LWRP-2613A	Federated Farmers of New Zealand	Delete Rule 15B.5.24(4) and replace with: All farming activities to achieve Industry GMP by 30 June 2020.	Reject	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13.
PC5LWRP-2196A	Ravensdown Limited	Amend Rule 15B.5.24 (3) as follows: 3. No ~~part~~more than 20 ha of the property within the Hakataramea River Zone or Hakataramea Hill Zone is used for winter grazing; and. Or such other or alternative wording which would properly address the concerns raised.	Accept in part	We adopt the recommendations in the Section 42A Report to omit this rule and incorporate the content of this rule into new Rule 15B.5.13. However in response to this and other submissions, and for the reasons set out in submissions and evidence, we recommend amendments to the notified provisions of PC5 which permit up to 20 hectares of winter grazing on any property within the Hakataramea River Zone and Hakataramea Hill Zone.
PC5LWRP-503A	DairyNZ	Amend Rule 15B.5.24 (3) as follows: 3. No ~~part~~more than 20 ha of the property within the Hakataramea River Zone or Hakataramea Hill Zone is used for winter grazing; and. Or words to similar effect.	Accept in part	

Rule 15B.5.25

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2198	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.25;	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2743	Director General of Conservation	Amend Rule 15B.5.25 as follows: Change the activity status to restricted discretionary activity;	Reject	
PC5LWRP-2198A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		resolved: Amend Rule 15B.5.25 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		
PC5LWRP-2614	Federated Farmers of New Zealand	Amend Rule 15B.5.25 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-1390	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.25, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-1935	Forest and Bird NZ	Delete Rule 15B.5.25.	Accept	
PC5LWRP-2198B	Ravensdown Limited	Amend Rule 15B.5.25(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	
PC5LWRP-2760	Fertiliser Association of New Zealand	Amend Rule 15B.5.25(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Accept in part	
PC5LWRP-2614C	Federated Farmers of New Zealand	Amend Rule 15B.5.25(2)(a) as follows: (a) Until 30 June 2020, the nitrogen baseline plus 5 kg N/ha/year , unless…	Reject	
PC5LWRP-504	DairyNZ	Amend Rule 15B.5.25(2)(b)(i) as follows: ~~(i)~~ either the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP , or the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice for the activity that occurred in the four years prior to 1 July 2020 ~~; and~~	Accept in part	
PC5LWRP-2614D	Federated Farmers of New Zealand	Amend Rule 15B.5.25(2)(b)(i) as follows: (i) either the baseline GMP Loss Rate plus 5 kg N/ha/year or…	Reject	
PC5LWRP-2198C	Ravensdown Limited	Delete Rule 15B.5.25 (2)(b)(ii).	Reject	
PC5LWRP-2614D	Federated Farmers of New Zealand	Delete Rule 15B.5.25(2)(b)(ii).	Reject	
PC5LWRP-504A	DairyNZ	Delete Rule 15B.5.25(2)(b)(ii).	Reject	
PC5LWRP-2198D	Ravensdown Limited	Amend Rule 15B.5.25(3) to read: (3) The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-504B	DairyNZ	Delete Rule 15B.5.25(3).	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2614A	Federated Farmers of New Zealand	Delete Rule 15B.5.25(3).	Reject	
PC5LWRP-504C	DairyNZ	Amend Rule 15B.5.25 matter of control (4) as follows: (4) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP and which require the farming activity to operate at below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice, in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline CMP Loss Rate or Loss Rate Assessed as Baseline GMP;	Accept in part	
PC5LWRP-504D	DairyNZ	Delete Rule 15B.5.25 matter of control (5) and amend numbering accordingly.	Reject	
PC5LWRP-765	Central South Island Fish and Game Council	Retain Rule 15B.5.25 matter of discretion (6) as notified.	Accept in part	
PC5LWRP-504E	DairyNZ	Amend Rule 15B.5.25 by adding a new matter of control: 10. Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	
PC5LWRP-2743A	Director General of Conservation	Amend Rule 15B.5.25 by adding a new matter of control: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2743B	Director General of Conservation	Amend Rule 15B.5.25 by adding a new matter of control: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2614B	Federated Farmers of New Zealand	Amend Rule 15B.5.25 by adding a new matter of control: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	
PC5LWRP-938	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.25 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-2727	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.26

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2199	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.26;	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2751	Director General of Conservation	Amend Rule 15B.5.26 to change the activity status to a fully discretionary activity if the relief sought in PC5LWRP-2751A and PC5LWRP-2751B is not accepted.	Reject	
PC5LWRP-2199A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		resolved: Amend Rule 15B.5.26 as follows: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		
PC5LWRP-2615	Federated Farmers of New Zealand	Amend Rule 15B.5.26 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-2079	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.26 as follows: Within the Hakataramea River Zone or Hakataramea Hill 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 or 3 of Rule 15B.5.25 is a restricted discretionary activity provide the following conditions are met:	Reject	
PC5LWRP-1936	Forest and Bird NZ	Amend Rule 15B.5.26 to replace reference to condition 3 of Rule 15B.5.15 with Rule 5.53	Reject	
PC5LWRP-1936A	Forest and Bird NZ	Amend Rule 15B.5.26 by adding a new condition as follows: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan notified after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity located on the application area, and proposes methods to avoid or mitigate any adverse effects on significant indigenous biodiversity.	Reject	
PC5LWRP-2199B	Ravensdown Limited	Amend Rule 15B.5.26(1) of to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor. Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-1689	Fertiliser Association of New Zealand	Amend Rule 15B.5.26(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Reject	
PC5LWRP-2615A	Federated Farmers of New Zealand	Amend Rule 15B.5.26(2)(a) as follows: (a) Until 30 June 2020, the nitrogen baseline plus 5 kg N/ha/year, unless…	Reject	
PC5LWRP-2615B	Federated Farmers of New Zealand	Amend Rule 15B.5.26(2)(b)(i) as follows: (i) either the baseline GMP Loss Rate plus 5 kg N/ha/year or…	Reject	
PC5LWRP-505	DairyNZ	Amend Rule 15B.5.26(2)(b)(i) as follows: ~~(i)~~ either the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP , or the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice for the activity that occurred in the four years prior to 1 July 2020; and	Accept in part	
PC5LWRP-2079A	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.26(b)(i) as follows: (i) either the greater of Baseline GMP Loss Rate and the Loss Rate Assessed as GMP Baseline; or the greater of the Good Practice Management Loss Rate and the Loss Rate Assessed as Good Management Practice ; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016; and the application for resource consent demonstrates that the exceedance was lawful;	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		and		
PC5LWRP-505A	DairyNZ	Delete Rule 15B.5.26(2)(b)(ii).	Reject	
PC5LWRP-2199C	Ravensdown Limited	Delete Rule 15B.5.26(2)(b)(ii).	Reject	
PC5LWRP-2615C	Federated Farmers of New Zealand	Delete Rule 15B.5.26(2)(b)(ii).	Reject	
PC5LWRP-2079B	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.26(b)(ii) as follows: (ii) for that portion of the property in the Hakataramea River Zone ~~and~~ that was used for winter grazing or irrigation in the four years prior to 1 July 2020, 90% of ~~that~~the greater of the Good Management Practice Loss Rate ~~figure~~and the Loss Rate assessed as Good Management Practice	Accept in part	
PC5LWRP-939	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.26 matter of discretion (4) as follows: 4. The potential adverse effects of the activity on wāhi tapu or wāhi taonga ~~identified in an iwi management plan~~ ; and	Accept in part	
PC5LWRP-505B	DairyNZ	Amend Rule 15B.5.26 matter of discretion (7) as follows: 7. Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP and which require the farming activity to operate at below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice, in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and Or words to similar effect.	Accept in part	
PC5LWRP-505C	DairyNZ	Delete Rule 15B.5.26 matter of discretion (8).	Reject	
PC5LWRP-1936B	Forest and Bird NZ	Amend Rule 15B.5.26 by adding a new matter of discretion as follows: Until biodiversity provisions in a district plan are notified post 13 February 2016, the extent to which the proposal avoids or mitigates any adverse effects on any areas of significant indigenous biodiversity.	Reject	
PC5LWRP-939A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.26 by adding a new matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-2079C	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.26 by adding a new matter of discretion as follows: The estimation of the Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	
PC5LWRP-2751A	Director General of Conservation	Amend Rule 15B.5.26 by adding a new matter of discretion as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and	Reject	
PC5LWRP-2751B	Director General of Conservation	Amend Rule 15B.5.26 by adding a new matter of discretion as follows: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2728	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.27

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1938	Forest and Bird NZ	Retain Rule 15.B.5.27 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2200	Ravensdown Limited	Retain the discretionary activity status of Rule 15B.5.27.	Accept in part	
PC5LWRP-1690A	Fertiliser Association of New Zealand	Amend Rule 15B.5.27 from a discretionary activity to a restricted discretionary activity.	Reject	
PC5LWRP-2200A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.27 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	
PC5LWRP-1397	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.27, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2616	Federated Farmers of New Zealand	Amend Rule 15B.5.27 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-2149	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.27 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate not exceeding the Baseline GMP Loss Rate; and 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 7. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		8. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 9. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 10. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-2200B	Ravensdown Limited	Amend Rule 15B.5.27(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor; Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-1690	Fertiliser Association of New Zealand	Amend Rule 15B.5.27(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Accept in part	
PC5LWRP-2616A	Federated Farmers of New Zealand	Amend Rule 15B.5.27(2)(a) as follows: (a) Until 30 June 2020, the nitrogen baseline plus 5 kg N/ha/year, unless…	Reject	
PC5LWRP-2082	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.27(2)(b)(i) as follows: From 1 July 2020: (i) either the greater of Baseline GMP Loss Rate and the Loss Rate Assessed as GMP Baseline; or the greater of the Good Practice Management Loss Rate and the Loss Rate Assessed as Good Management Practice unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016; and the application for resource consent demonstrates that the exceedance was lawful. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	
PC5LWRP-506	DairyNZ	Amend Rule 15B.5.27(2)(b)(i) as follows: ~~(i) either~~ the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP or the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice for the activity that occurred in the four years prior to 1 July 2020 ~~; and~~ Or words to similar effect.	Reject	
PC5LWRP-2616B	Federated Farmers of New Zealand	Amend Rule 15B.5.27(2)(b)(i) as follows: (i) either the baseline GMP Loss Rate plus 5 kg N/ha/year or…	Reject	
PC5LWRP-2082A	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.27(2)(b)(ii) as follows: (ii) for that portion of the property [those properties] in the Hakataramea River Zone ~~and~~ that was used for winter grazing or irrigation in the four years prior to 1 July 2020, 90% of ~~that~~the greater of the Good Management Practice Loss Rate ~~figure~~and the Loss Rate assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to give effect to the relief sought.	Accept in part	
PC5LWRP-2200C	Ravensdown Limited	Delete Rule 15B.5.27(2)(b)(ii).	Reject	
PC5LWRP-506A	DairyNZ	Delete Rule 15B.5.27(2)(b)(ii).	Reject	
PC5LWRP-2616C	Federated Farmers of New Zealand	Delete Rule 15B.5.27(2)(b)(ii).	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2729	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.28

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2388	Federated Farmers of New Zealand	Retain Rule 15B.5.28 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-1939	Forest and Bird NZ	Retain Rule 15.B.5.28 as notified.	Accept in part	
PC5LWRP-797	Waitaki Irrigators Collective Ltd	Delete Rules 15B.5.24-15B.5.48 and replace with alternative rule framework detailed in PC5LWRP-790.	Reject	
PC5LWRP-1036	Morven Glenavy Ikawai Irrigation Co Ltd	Delete Rules 15B.5.24-15B.5.48 and replace with alternative rule framework detailed in PC5LWRP-1026.	Reject	
PC5LWRP-1693	Fertiliser Association of New Zealand	Amend Rule 15B.5.28 from a non complying activity to a discretionary activity.	Reject	
PC5LWRP-2201	Ravensdown Limited	Amend Rule 15B.5.28 from a non-complying activity to a discretionary activity.	Reject	
PC5LWRP-507	DairyNZ	Amend Rule 15B.5.28 as follows: Within the Hakataramea River Zone or Hakataramea Hill Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not meet condition 1 or 2 of Rule 15B.5.25, or condition 1 or 2 of Rule 15B.5.26, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 1 , 2 or 3 of Rule 15B.5.27, is a non-complying activity. Or words to similar effect.	Reject	
PC5LWRP-2730	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.29

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1940	Forest and Bird NZ	Retain Rule 15.B.5.29 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-798	Waitaki Irrigators Collective Ltd	Delete Rules 15B.5.24-15B.5.48 and replace with alternative rule framework detailed in PC5LWRP-790.	Reject	
PC5LWRP-1038	Morven Glenavy Ikawai Irrigation Co Ltd	Delete Rules 15B.5.24-15B.5.48 and replace with alternative rule framework detailed in PC5LWRP-1026.	Reject	
PC5LWRP-508	DairyNZ	Delete Rule 15B.5.29.	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1694	Fertiliser Association of New Zealand	Amend Rule 15B.5.29 from a prohibited activity to a discretionary activity. OR Amend to combine with Rule 15B.5.28.	Reject	
PC5LWRP-2202	Ravensdown Limited	Amend Rule 15B.5.29 from a prohibited activity to a discretionary activity;	Reject	
PC5LWRP-2617A	Federated Farmers of New Zealand	Amend Rule 15B.5.29 from a prohibited activity to a non complying activity.	Reject	
PC5LWRP-2202A	Ravensdown Limited	Amend Rule 15B.5.29 to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Reject	
PC5LWRP-2617	Federated Farmers of New Zealand	Amend Rule 15B.5.29 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Reject	
PC5LWRP-2731	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule Hakataramea Flat Zone

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1103	White K A	Amend the Hakataramea Flat Zone to not allocate the 4% headroom.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.

Rule 15B.5.30

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2204	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.30;	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2744	Director General of Conservation	Amend Rule 15B.5.30 as follows: Change the activity status to restricted discretionary activity;	Reject	
PC5LWRP-1941	Forest and Bird NZ	Delete Rule 15B.5.30.	Reject	
PC5LWRP-1399	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.30, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2204A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.30 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		
PC5LWRP-2618	Federated Farmers of New Zealand	Amend Rule 15B.5.30 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-2204B	Ravensdown Limited	Amend Rule 15B.5.30(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	
PC5LWRP-1695	Fertiliser Association of New Zealand	Amend Rule 15B.5.30(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Accept in part	
PC5LWRP-92	DairyNZ	Amend Rule 15B.5.30(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Hakataramea Flat Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate or 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; and	Accept in part	
PC5LWRP-2618A	Federated Farmers of New Zealand	Amend Rule 15B.5.30 (2) to enable the nitrogen loss calculation to come up to the nitrogen baseline plus 5 kg N/ha/year (up to 30 June 2020) or the GMP Loss Rate plus 5kg N/ha/year (from 1 July 2020).	Reject	
PC5LWRP-92A	DairyNZ	Delete Rule 15B.5.30(3).	Reject	
PC5LWRP-2618B	Federated Farmers of New Zealand	Delete Rule 15B.5.30(3).	Reject	
PC5LWRP-2204C	Ravensdown Limited	Amend Rule 15B.5.30(3) to read: (3)The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-92B	DairyNZ	Amend Rule 15B.5.30 matter of control (4) as follows: (4) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	
PC5LWRP-92C	DairyNZ	Amend Rule 15B.5.30 matter of control (5) as follows: (5) Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	
PC5LWRP-92D	DairyNZ	Amend Rule 15B.5.30 by inserting a new matter of control as follows: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	
PC5LWRP-2618C	Federated Farmers of New Zealand	Amend Rule 15B.5.30 by inserting a new matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	
PC5LWRP-940	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu &	Amend Rule 15B.5.30 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Ngāi Tahu Farming Limited	And any consequential amendments.		
PC5LWRP-2744A	Director General of Conservation	Amend Rule 15B.5.30 by inserting a new matter of control as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2744B	Director General of Conservation	Amend Rule 15B.5.30 by inserting a new matter of control as follows: Methods to protect significant indigenous freshwater biodiversity and habitat.; And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2732	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.31

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2205	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.31;	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2752	Director General of Conservation	Amend Rule 15B.5.31 to change the activity status to a fully discretionary activity if the relief sought in submission points PC5LWRP-2752A and PC5LWRP-2752B is not accepted.	Reject	
PC5LWRP-1400	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.31, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2205A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.31 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	
PC5LWRP-2619	Federated Farmers of New Zealand	Amend Rule 15B.5.31 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-1942	Forest and Bird NZ	Amend Rule 15B.5.31 to replace reference to condition 3 of Rule 15B.5.15 with Rule 5.53	Reject	
PC5LWRP-1942A	Forest and Bird NZ	Amend Rule 15B.5.31 by adding a new condition: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan notified after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		located on the application area, and proposes methods to avoid or mitigate any adverse effects on significant indigenous biodiversity.		
PC5LWRP-2205B	Ravensdown Limited	Amend Rule 15B.5.31(1) of to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor; Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-77	DairyNZ	Amend Rule 15B.5.31(2) as follows: 2. ~~Until 30 June 2020, t~~The nitrogen loss calculation for the part of the property within the Hakataramea Flat Zone does not exceed ~~the nitrogen baseline, and from 1 July 2020~~ the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP from 1 July 2020; unless the nitrogen baseline was lawfully exceeded and the application for resource consent demonstrates that the exceedance was lawful.	Accept in part	
PC5LWRP-2084	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.31 (2) as follows: 2. Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Hakataramea Flat Zone does not exceed the nitrogen baseline, and from 1 July 2020 the ~~Baseline GMP Loss Rate~~Loss Rate Assessed as GMP Baseline; unless the nitrogen baseline was lawfully exceeded...	Accept in part	
PC5LWRP-1696	Fertiliser Association of New Zealand	Amend Rule 15B.5.31(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion include provision to consider demonstration of meeting Good Management Practice.	Reject	
PC5LWRP-2619A	Federated Farmers of New Zealand	Amend Rule 15B.5.31(2) to enable the nitrogen loss calculation to come up to the nitrogen baseline plus 5 kg N/ha/year (up to 30 June 2020) or the GMP Loss Rate plus 5kg N/ha/year (from 1 July 2020).	Reject	
PC5LWRP-942	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.31 matters of discretion (3) as follows: 3. The potential adverse effects of the activity on mahinga kai and the ability to exercise kaitiakitanga; and	Reject	
PC5LWRP-942A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.31 matters of discretion (4) as follows: 4. The potential adverse effects of the activity on wāhi tapu or wāhi taonga ~~identified in an iwi management plan~~ ; and	Accept in part	
PC5LWRP-77A	DairyNZ	Amend Rule 15B.5.31 matter of discretion (8) as follows: 8. Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and Or words to similar effect.	Accept in part	
PC5LWRP-2752A	Director General of Conservation	Amend Rule 15B.5.31 by adding the following matter of control: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2752B	Director General of Conservation	Amend Rule 15B.5.31 by adding the following matter of control: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2084A	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.31 by inserting a new matter of discretion as follows: The estimation of the Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	
PC5LWRP-942B	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.31 by inserting a new matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-1942B	Forest and Bird NZ	Amend Rule 15B.5.31 by inserting a new matter of discretion as follows: Until biodiversity provisions in a district plan are notified post 13 February 2016, the extent to which the proposal avoids or mitigates any adverse effects on any areas of significant indigenous biodiversity.	Reject	
PC5LWRP-2733	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.32

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1944	Forest and Bird NZ	Retain Rule 15B.5.32 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2391	Federated Farmers of New Zealand	Retain Rule 15B.5.32 as notified.		
PC5LWRP-1697	Fertiliser Association of New Zealand	Amend Rule 15B.5.32 from a non complying activity to a discretionary activity.	Reject	
PC5LWRP-2206	Ravensdown Limited	Amend Rule 15B.5.32 from a non-complying activity to a discretionary activity.	Reject	
PC5LWRP-598	DairyNZ	Amend Rule 15B.5.32 as follows: Within the Hakataramea Flat Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not meet condition 1 of Rule 15B.5.30, or condition 1 or 2 of Rule15B.5.31, or the use of land for a farming activity as part of a farming enterprise that does not meet conditions 1 , 2 or 3 of Rule 5.46A, is a non- complying activity. Or words to similar effect.	Reject	
PC5LWRP-2734	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea river and hill zones to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Rule 15B.5.33

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1945	Forest and Bird NZ	Retain Rule 15B.5.33 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-599	DairyNZ	Delete Rule 15B.5.33.	Reject	
PC5LWRP-1698	Fertiliser Association of New Zealand	Amend Rule 15B.5.33 from a prohibited activity to a discretionary activity. Or in the alternative combine with Rule 15B.5.32 as discretionary activity.	Reject	
PC5LWRP-2207	Ravensdown Limited	Amend Rule 15B.5.33 from a prohibited activity to a discretionary activity.	Reject	
PC5LWRP-2762	Federated Farmers of New Zealand	Amend Rule 15B.5.33 from a prohibited activity to a non complying activity.	Reject	
PC5LWRP-2207A	Ravensdown Limited	Amend Rule 15B.5.33 to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Accept in part	
PC5LWRP-1679	Phillips N and S	Submitter opposes reduction in nitrogen losses for low nutrient loss farm systems in Hakataramea River Zone if water limits are breached. Submitter requests further expansion to the rule/ policy framework for the Hakataramea flat zone to ensure high nitrogen emitters (on a per hectare basis), are the first parties that are required to make reductions in nutrient loss in the event of reductions being necessary.	Reject	

Note Valley and Tributaries Zone

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-600	DairyNZ	Amend Valley and Tributaries Zone notes as follows: 1. Regional Green Zone Rule 5.57A, 5.57B, 5.57C apply in the Valley and Tributaries Zone. 2. Rules 15B.5.34, 15B.5.35, 15B.5.36, 15B.5.37 and 15B.5.38 prevail over Regional Green Zone Rules ~~5.57C~~, 5.58A, 5.58B and 5.59A in the Valley and Tributaries Zone. 3. Rule 15B.5.7 applies in the Valley and Tributaries Zone.	Reject	We are recommending the omission of these notes and inserting into Part B of the plan region-wide rule rules referred to in these notes.

Rule 15B.5.34 (now recommended Rule 15B.5.27)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2208	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.34.	Accept	We agree that retaining a controlled activity classification is appropriate.
PC5LWRP-1946	Forest and Bird NZ	Delete Rule 15B.5.34.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2745	Director General of Conservation	Amend Rule 15B.5.34 as follows: Change the activity status to restricted discretionary activity.	Reject	The requested amendment would be disproportionately onerous. It would foreclose reasonable opportunities for economic growth and employment.
PC5LWRP-2208A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.34 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-601	DairyNZ	Amend Rule 15B.5.34 as follows: Within the Valley and Tributaries Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not comply with one or more of the conditions of Rule 5.57 ~~B~~C is a controlled activity provided the following conditions are met: …	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2620	Federated Farmers of New Zealand	Amend Rule 15B.5.34 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1402	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.34, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information. And make any consequential amendments.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2208B	Ravensdown Limited	Amend Rule 15B.5.34(1) of to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-601A	DairyNZ	Amend Rule 15B.5.34(2) as follows: 2. Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Valley and Tributaries Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate or 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 ~~; and~~	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-1699	Fertiliser Association of New Zealand	Amend Rule 15B.5.34(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.		
PC5LWRP-601B	DairyNZ	Delete Rule 15B.5.34(3).	Reject	The omission of this condition from this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.
PC5LWRP-2620A	Federated Farmers of New Zealand	Delete Rule 15B.5.34(3).		
PC5LWRP-2208C	Ravensdown Limited	Amend Rule 15B.5.34(3) to read: (3) The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-601C	DairyNZ	Amend Rule 15B.5.34 matter of control (4) as follows: (4) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-601D	DairyNZ	Amend Rule 15B.5.34 matter of control (5) as follows: (5) Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and...		
PC5LWRP-601E	DairyNZ	Amend Rule 15B.5.34 by inserting a new matter of control as follows: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	This matter is already addressed by conditions 1 and 3 of this rule.
PC5LWRP-989	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.34 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	See Chapter 10 of this report.
PC5LWRP-2620B	Federated Farmers of New Zealand	Amend Rule 15B.5.34 to include an additional matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	This matter is already addressed by matters of control 2, 3, 4 and 5 of this rule.
PC5LWRP-2745A	Director General of Conservation	Amend Rule 15B.5.34 to include an additional matter of control as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2745B	Director General of Conservation	Amend Rule 15B.5.34 to include an additional matter of control as follows: Methods to protect significant indigenous freshwater biodiversity and habitat. And further or alternative relief to like effect to that sought.		

Rule 15B.5.35 (now recommended Rule 15B.5.28)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2393	Federated Farmers of New Zealand	Retain Rule 15B.5.35 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2209	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.35.	Accept	We agree that retaining a restricted discretionary activity classification is appropriate.
PC5LWRP-603	DairyNZ	Retain Rule 15B.5.35 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2753	Director General of Conservation	Amend Rule 15B.5.35 to change the activity status to a fully discretionary activity if the relief sought in submission points PC5LWRP-2753A and PC5LWRP-2753B is not accepted.	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1700	Fertiliser Association of New Zealand	Retain Rule 15B.5.35, but clarify the term 'agricultural nitrogen load limit' in reference to Schedule 27 Part C and where in the Schedule the term features.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for reasons of clarity.
PC5LWRP-2209A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.34 to:	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		• Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-2209C	Ravensdown Limited	Clarify the term 'agricultural nitrogen load limit', with specific reference to its use in Schedule 27; Or such other or alternative wording which would properly address the concerns raised.	Accept in part	In response to this and other submissions we recommend an amendment to the general effect requested, for reasons of clarity.
PC5LWRP-1403	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.35, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-1947A	Forest and Bird NZ	Replace reference to condition 3 of Rule 15B.5.35 with Rule 5.53.	Reject	We are recommending omitting Rule 5.53.
PC5LWRP-2209B	Ravensdown Limited	Amend Rule 15B.5.35(1) of to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor;	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1947	Forest and Bird NZ	Amend Rule 15B.5.35(2) by adding after condition 2: Or; Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Valley and Tributaries Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful; or	Reject	We are not persuaded that the amendment requested would be a more effective and reasonably practicable option for achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1947B	Forest and Bird NZ	Amend Rule 15B.5.35 by adding a new condition: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan notified after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity located on the application area, and proposes methods to avoid or mitigate any adverse effects on significant indigenous biodiversity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2085	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.35 matters of discretion (4) and (5) to clarify how a GMP Loss Rate can be less than a nitrogen load limit expressed in tonnes per year. And make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-603A	DairyNZ	Amend Rule 15B.5.35 matter of discretion (5) as follows: (5) Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the agricultural nitrogen load limit, calculated in accordance with Schedule 27; and.. Or words to similar effect.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-994	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming	Amend Rule 15B.5.35 to include an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx	Reject	See Chapter 10 of this report.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Limited			
PC5LWRP-1947C	Forest and Bird NZ	Amend Rule 15B.5.35 to include an additional matter of discretion as follows: Until biodiversity provisions in a district plan are notified post 13 February 2016, the extent to which the proposal avoids or mitigates any adverse effects on any areas of significant indigenous biodiversity.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2753A	Director General of Conservation	Amend Rule 15B.5.35 to include an additional matter of discretion as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and And further or alternative relief to like effect to that sought.		
PC5LWRP-2753B	Director General of Conservation	Amend Rule 15B.5.35 to include an additional matter of discretion as follows: Methods to protect significant indigenous freshwater biodiversity and habitat And further or alternative relief to like effect to that sought.		

Rule 15B.5.36 (now recommended Rule 15B.5.29)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-618	DairyNZ	Retain Rule 15B.5.36 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2394	Federated Farmers of New Zealand	Retain Rule 15B.5.36 as notified.		
PC5LWRP-2210	Ravensdown Limited	Retain the discretionary activity status of Rule 15B.5.36.	Accept	We agree that a discretionary activity classification is appropriate.
PC5LWRP-2167	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.36 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate that will not cause the applicable load limit calculated in accordance with Schedule 27 to be exceeded; and 6. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 7. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 8. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 9. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1404	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs	Reject	The amendments requested would unjustifiably weaken the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		in Rule 15B.5.36, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.		provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 6 of this report.
PC5LWRP-2210A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.36 as follows: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report. See also Chapter 14 of this report with respect to request to embed the GMP loss rate within the FEP process.
PC5LWRP-2210B	Ravensdown Limited	Amend Rule 15B.5.36(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor; Or such other or alternative wording which would properly address the concerns raised.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1701	Fertiliser Association of New Zealand	Amend Rule 15B.5.36(2) to refer to Table 15B(f).	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Rule 15B.5.37 (now recommended Rule 15B.5.30)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1948	Forest and Bird NZ	Retain Rule 15B.5.37 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-2397	Federated Farmers of New Zealand	Retain Rule 15B.5.37 as notified.		
PC5LWRP-1702	Fertiliser Association of New Zealand	Amend Rule 15B.5.37 from a non complying activity to a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2211	Ravensdown Limited	Amend Rule 15B.5.37 from a non-complying activity to a discretionary activity.		
PC5LWRP-620	DairyNZ	Amend Rule 15B.5.37 as follows: Within the Valley and Tributaries Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not meet condition 1 of Rule 15B.5.34, or condition 1 or 2 of 15B.5.35, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 1 , 2 or 3 of Rule 15B.5.36, is a non-complying activity. Or words to similar effect.		

Rule 15B.5.38 (now recommended Rule 15B.5.31)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1949	Forest and Bird NZ	Retain Rule 15B.5.38 as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1703	Fertiliser Association of New Zealand	Amend Rule 15B.5.38 from a prohibited activity to a discretionary activity. OR Amend to combine with Rule 15B.5.37 as a discretionary activity.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-2212	Ravensdown Limited	Amend Rule 15B.5.38 from a prohibited activity to a discretionary activity.		
PC5LWRP-2399	Federated Farmers of New Zealand	Amend Rule 15B.5.38 from a prohibited activity to a non complying activity.		
PC5LWRP-2212A	Ravensdown Limited	Amend to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Accept in part	These submissions request provision in Plan Change 5 for an alternative method to the Farm Portal for estimating nutrient losses under good management practice. We agree that, in limited circumstances, an alternative method is appropriate and have recommended amendments to Plan Change 5 accordingly. See also Chapter 9 of this report.
PC5LWRP-621	DairyNZ	Delete Rule 15B.5.38.	Reject	The omission of this rule would unjustifiably weaken the LWRP and reduce its effectiveness in achieving its objectives and for giving effect to the superior instruments.

Rules - Greater Waikākahi Zone General

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2622	Federated Farmers of New Zealand	Amend the Greater Waikākahi Zone Rules to apply Rules 15B.5.34-15B.5.38 to areas in existing Green Nutrient Allocation Zones.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments. See Chapter 17 of this report.

Rule 15B.5.39

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2213	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.39.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2746	Director General of Conservation	Amend Rule 15B.5.39 as follows: Change the activity status to restricted discretionary activity.	Reject	
PC5LWRP-2213A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.39 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent;		
PC5LWRP-1191	Waihuna Dairies Ltd	Amend Rule 15B.5.39 to require properties in the Greater Waikākahi Zone to be at GMP not 90% of GMP.	Accept in part	
PC5LWRP-1247	Hurst M J F	Amend Rule 15B.5.39 to achieve removal of the requirement for farms to operate at 10% below GMP by 2020.	Accept in part	
PC5LWRP-2621	Federated Farmers of New Zealand	Amend Rule 15B.5.39 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-1406	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.39, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2054	van't Klooster G	Amend Rule 15B.5.39 to delete requirement to reduce to 90% of GMP.	Accept in part	
PC5LWRP-1950	Forest and Bird NZ	Delete Rule 15B.5.39.	Reject	
PC5LWRP-2213B	Ravensdown Limited	Amend Rule 15B.5.39(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	
PC5LWRP-1705	Fertiliser Association of New Zealand	Amend Rule 15B.5.39(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Reject	
PC5LWRP-624	DairyNZ	Amend Rule 15B.5.39(2)(b)(i) as follows: ~~(i) either~~ the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP or the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice for the activity that occurred in the four years prior to 1 July 2020 ~~; and~~	Accept in part	
PC5LWRP-624A	DairyNZ	Delete Rule 15B.5.39(2)(b)(ii).	Reject	
PC5LWRP-2213C	Ravensdown Limited	Delete Rule 15B.5.39(2)(b)(ii).	Reject	
PC5LWRP-624B	DairyNZ	Delete Rule 15B.5.39(3).	Reject	
PC5LWRP-2621A	Federated Farmers of New Zealand	Delete Rule 15B.5.39(3).	Reject	
PC5LWRP-2213D	Ravensdown Limited	Amend Rule 15B.5.39(3) of to read: (3) The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-624C	DairyNZ	Amend Rule 15B.5.39 matter of control (4) as follows: (4) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP and which require the farming activity to operate at below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	
PC5LWRP-624D	DairyNZ	Delete Rule 15B.5.39 matter of control (5) and amend numbering accordingly.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-624E	DairyNZ	Amend Rule 15B.5.39 to include an additional matter of control as follows: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	
PC5LWRP-996	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.39 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-2621B	Federated Farmers of New Zealand	Amend Rule 15B.5.39 to include an additional matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	
PC5LWRP-2746A	Director General of Conservation	Amend Rule 15B.5.39 to include an additional matter of control as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2746B	Director General of Conservation	Amend Rule 15B.5.39 to include an additional matter of control as follows: Methods to protect significant indigenous freshwater biodiversity and habitat And further or alternative relief to like effect to that sought.	Reject	

Rule 15B.5.40

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2214	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.40.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2754	Director General of Conservation	Amend Rule 15B.5.40 to change the activity status to a fully discretionary activity if the relief sought in submission points PC5LWRP-2754A and PC5LWRP-2754B is not accepted.	Reject	
PC5LWRP-1408	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.40, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2055	van't Klooster G	Delete requirement to reduce to 90% of GMP.	Accept in part	
PC5LWRP-2214A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.40 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	
PC5LWRP-2624	Federated Farmers of New Zealand	Amend Rule 15B.5.40 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-2624A	Federated Farmers of	Amend the Greater Waikākahi Zone Rules to apply Rules 15B.5.34-15B.5.38 to areas in existing	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	New Zealand	Green Nutrient Allocation Zones.		
PC5LWRP-1192	Waihuna Dairies Ltd	Amend to require properties in the Greater Waikākahi Zone to be at GMP not 90% of GMP.	Accept in part	
PC5LWRP-1256	Hurst M J F	Amend Rule 15B.5.40 to achieve removal of the requirement for farms to operate at 10% below GMP by 2020.	Accept in part	
PC5LWRP-2214B	Ravensdown Limited	Amend Rule 15B.5.40(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	
PC5LWRP-1704	Fertiliser Association of New Zealand	Amend Rule 15B.5.40(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Reject	
PC5LWRP-635	DairyNZ	Amend Rule 15B.5.40(2)(b)(i) as follows: (i) ~~either~~ the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP or the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice for the activity that occurred in the four years prior to 1 July 2020 ~~; and~~	Accept in part	
PC5LWRP-2091	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.40(2)(b)(i) as follows: (i) either the greater of Baseline GMP Loss Rate and the Loss Rate Assessed as GMP Baseline; or the greater of the Good Practice Management Loss Rate and the Loss Rate Assessed as Good Management Practice [*for the activity that occured in the four years prior to 1 July 2020*]; and	Accept in part	
PC5LWRP-2091A	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.40(2)(b)(ii) as follows: (ii) for that portion of the property in the Greater Waikākahi Zone and that was used for winter grazing or irrigation in the four years prior to 1 July 2020 90% of ~~that~~the greater of the Good Management Practice Loss Rate ~~figure~~and the Loss Rate assessed as Good Management Practice."	Reject	
PC5LWRP-635A	DairyNZ	Delete Rule 15B.5.40(2)(b)(ii).	Accept in part	
PC5LWRP-2214C	Ravensdown Limited	Delete Rule 15B.5.40(2)(b)(ii).	Accept in part	
PC5LWRP-1951	Forest and Bird NZ	Amend Rule 15B.5.40 to include a new condition as follows: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan notified after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity located on the application area, and proposes methods to avoid or mitigate any adverse effects on significant indigenous biodiversity.	Reject	
PC5LWRP-635B	DairyNZ	Amend Rule 15B.5.40 matter of discretion (4) as follows: 4. Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP and which require the farming activity to operate at below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and Or words to similar effect.	Reject	
PC5LWRP-635C	DairyNZ	Delete Rule 15B.5.40 matter of discretion (5) and re-order numbering accordingly.	Reject	
PC5LWRP-2754A	Director General of Conservation	Amend Rule 15B.5.40 by adding the following matter of control: Methods to protect significant indigenous terrestrial biodiversity and habitat until the	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		requirements of Policy 15B.4.23 (b) are met, and And further or alternative relief to like effect to that sought.		
PC5LWRP-2754B	Director General of Conservation	Amend Rule 15B.5.40 by adding the following matter of control: 4. Methods to protect significant indigenous freshwater biodiversity and habitat And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-1000	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.40 to include an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-1951A	Forest and Bird NZ	Amend Rule 15B.5.40 to include an additional matter of discretion as follows: Until biodiversity provisions in a district plan are notified post 13 February 2016, the extent to which the proposal avoids or mitigates any adverse effects on any areas of significant indigenous biodiversity.	Reject	
PC5LWRP-2091B	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.40 to include an additional matter of discretion as follows The estimation of the Loss Rate Assessed as Good Management Practice. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	

Rule 15B.5.41

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1952	Forest and Bird NZ	Retain Rule 15B.5.41 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2215	Ravensdown Limited	Retain the discretionary activity status of Rule 15B.5.41;	Accept in part	
PC5LWRP-2152	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.41 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate not exceeding the Baseline GMP Loss Rate; and 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 7. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 8. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 9. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 10. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.		
PC5LWRP-1409	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.41, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2215A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.41 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent. Or such other or alternative wording which would properly address the concerns raised.	Accept in part	
PC5LWRP-2625	Federated Farmers of New Zealand	Amend Rule 15B.5.41 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Accept in part	
PC5LWRP-2625A	Federated Farmers of New Zealand	Amend the Greater Waikākahi Zone Rules to apply Rules 15B.5.34-15B.5.38 to areas in existing Green Nutrient Allocation Zones.	Reject	
PC5LWRP-1259	Hurst M J F	Amend Rule 15B.5.41 to achieve removal of the requirement for farms to operate at 10% below GMP by 2020.	Accept in part	
PC5LWRP-1193	Waihuna Dairies Ltd	Amend to require properties in the Greater Waikākahi Zone to be at GMP not 90% of GMP.	Accept in part	
PC5LWRP-2056	van't Klooster G	Amend Rule 15B.5.41 by deleting the requirement to reduce to 90% of GMP.	Accept in part	
PC5LWRP-642	DairyNZ	Amend Rule 15B.5.41 to provide for a Restricted Discretionary consent pathway, with the Matters of Discretion similar to those outlined in PC5LWRP-635 (Rule 15B.5.40).	Reject	
PC5LWRP-2215B	Ravensdown Limited	Amend Rule 15B.5.41(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	
PC5LWRP-1706	Fertiliser Association of New Zealand	Amend Rule 15B.5.41(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal. Under matters for discretion, include provision to consider demonstration of meeting Good Management Practice.	Reject	
PC5LWRP-2215C	Ravensdown Limited	Delete Rule 15B.5.41(2)(b)(ii)	Accept in part	

Rule 15B.5.42

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2402	Federated Farmers of New Zealand	Retain Rule 15B.5.42 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-1953	Forest and Bird NZ	Retain Rule 15B.5.42 as notified.	Accept in part	
PC5LWRP-1707	Fertiliser Association of New Zealand	Amend Rule 15B.5.42 from a non complying activity to a discretionary activity.	Reject	
PC5LWRP-2217	Ravensdown Limited	Amend Rule 15B.5.42 from a non-complying activity to a discretionary activity.	Reject	
PC5LWRP-655	DairyNZ	Amend Rule 15B.5.42 as follows: Within the Greater Waikākahi Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not meet condition 1 of Rule 15B.5.39, or condition 1 or 2 of Rule 15B.5.40, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 1 , 2 or 3 of Rule 15B.5.41, is a non-complying activity. Or words to similar effect.	Reject	

Rule 15B.5.43

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1954	Forest and Bird NZ	Retain Rule 15B.5.43 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-1708	Fertiliser Association of New Zealand	Amend Rule 15B.5.43 from a prohibited activity to a discretionary activity. OR Amend to combine with Rule 15B.5.42 as a discretionary activity.	Reject	
PC5LWRP-2218	Ravensdown Limited	Amend Rule 15B.5.43 from a prohibited activity to a discretionary activity.	Reject	
PC5LWRP-2403	Federated Farmers of New Zealand	Amend Rule 15B.5.43 from a prohibited to a non complying activity.	Reject	
PC5LWRP-657	DairyNZ	Delete Rule 15B.5.43 and farming activities which do not meet the condition 2 of Rule 15B.5.40, or conditions 2 or 3 of Rule 15B.5.41, default to a non-complying activity under 15B.5.42.	Reject	
PC5LWRP-2218A	Ravensdown Limited	Amend to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Reject	
PC5LWRP-2403A	Federated Farmers of New Zealand	Amend the Greater Waikākahi Zone Rules to apply Rules 15B.5.34-15B.5.38 to areas in existing Green Nutrient Allocation Zones.	Reject	

Rule 15B.5.44

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2216	Ravensdown Limited	Retain the controlled activity status of Rule 15B.5.44.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2747	Director General of Conservation	Amend Rule 15B.5.44 as follows: Change the activity status to restricted discretionary activity;	Reject	
PC5LWRP-1411	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		in Rule 15B.5.44, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.		
PC5LWRP-1955	Forest and Bird NZ	Delete Rule 15B.5.44.	Reject	
PC5LWRP-659A	DairyNZ	Delete Rule 15B.5.44(3).	Reject	
PC5LWRP-2626A	Federated Farmers of New Zealand	Delete Rule 15B.5.44(3).	Reject	
PC5LWRP-2216A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.44 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	
PC5LWRP-2626	Federated Farmers of New Zealand	Amend Rule 15B.5.44 to provide an alternative pathway for farm systems and individual situations where the portal is not capable or produces aberrant results [PC5LWRP-2425].	Reject	
PC5LWRP-2216B	Ravensdown Limited	Amend Rule 15B.5.44(1) of to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor.	Reject	
PC5LWRP-1709	Fertiliser Association of New Zealand	Amend Rule 15B.5.44(2) to provide for an alternate pathway for farm systems which cannot use the Farm Portal.	Reject	
PC5LWRP-659	DairyNZ	Amend Rule 15B.5.44(2) as follows: (2) Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Whitneys Creek Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate or 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 ~~; and~~	Accept in part	
PC5LWRP-2216C	Ravensdown Limited	Amend Rule 15B.5.44(3) of to read: (3) The Farm Environment Plan and nutrient budget (prepared by a Certified Nutrient Management Adviser) submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-659B	DairyNZ	Amend Rule 15B.5.44 matter of control (4) as follows: (4) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	
PC5LWRP-659C	DairyNZ	Amend Rule 15B.5.44 matter of control (5) as follows: (5) Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-659D	DairyNZ	Amend Rule 15B.5.44 matter of control (6) as follows: (6) Methods to ensure compliance with the Good Management Practice Loss Rates or Loss Rates Assessed as Good Management Practice for the farming activity, inclusive where relevant, of any nitrogen received from any industrial discharge; and	Accept in part	
PC5LWRP-659E	DairyNZ	Amend Rule 15B.5.44 to include an additional matter of control as follows: Whether the Farm Environment Plan and nutrient budget submitted with the application for resource consent has been prepared or reviewed by an Accredited Farm Consultant. Or words to similar effect.	Reject	
PC5LWRP-1002	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.44 to include an additional matter of control as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-2626B	Federated Farmers of New Zealand	Amend Rule 15B.5.44 to include an additional matter of control as follows: Methods to ensure the quality of the Farm Environment Plan and nutrient budget.	Reject	
PC5LWRP-2747A	Director General of Conservation	Amend Rule 15B.5.44 to include an additional matter of control as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 are met, and And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2747B	Director General of Conservation	Amend Rule 15B.5.44 to include an additional matter of control as follows: Methods to protect significant indigenous freshwater biodiversity and habitat And further or alternative relief to like effect to that sought.	Reject	

Rule 15B.5.45

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1710	Fertiliser Association of New Zealand	Retain Rule 15B.5.45 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2422	Federated Farmers of New Zealand	Retain Rule 15B.5.45 as notified.	Accept in part	
PC5LWRP-2219	Ravensdown Limited	Retain the restricted discretionary activity status of Rule 15B.5.45.	Accept in part	
PC5LWRP-665	DairyNZ	Retain Rule 15B.5.45 as notified.	Accept in part	
PC5LWRP-2755	Director General of Conservation	Amend Rule 15B.5.45 to change the activity status to a fully discretionary activity if the relief sought in submission points PC5LWRP-2755A and PC5LWRP-2755B is not accepted.	Reject	
PC5LWRP-1413	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.45, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2219A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.45 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.		
PC5LWRP-2219B	Ravensdown Limited	Amend Rule 15B.5.45(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor. Or such other or alternative wording which would properly address the concerns raised.	Reject	
PC5LWRP-1956	Forest and Bird NZ	Amend Rule 15B.5.45 to include the follow after condition 2: Or; Until 30 June 2020, the nitrogen loss calculation for the part of the property within the Whitney's Creek Zone does not exceed the nitrogen baseline, and from 1 July 2020 the Baseline GMP Loss Rate; unless the nitrogen baseline was lawfully exceeded prior to 13 February 2016, and the application for resource consent demonstrates that the exceedance was lawful; OR Replace reference to condition 3 of Rule 15B.5.15 with Rule 5.53.	Reject	
PC5LWRP-1956A	Forest and Bird NZ	Amend Rule 15B.5.45 to include a new condition: Except where areas of significant indigenous biodiversity have been identified and maintained in accordance with the provisions of any relevant district plan notified after 13 February 2016, the application for resource consent is accompanied by an assessment, undertaken by a suitably qualified ecologist, which identifies any areas of significant indigenous biodiversity located on the application area, and proposes methods to avoid or mitigate any adverse effects on significant indigenous biodiversity.	Reject	
PC5LWRP-1005	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.45 matters of discretion (3) as follows: (3) The potential adverse effects of the activity on mahinga kai and the ability to exercise kaitiakitanga; and	Reject	
PC5LWRP-1005A	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.45 matters of discretion (4) as follows: 4. The potential adverse effects of the activity on wāhi tapu or wāhi taonga ~~identified in an iwi management plan~~ ; and	Accept in part	
PC5LWRP-2100	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.45 matters of discretion (7) as follows: 7. Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the greater of the Baseline GMP Loss Rate and the Loss Assessed as the Baseline GMP ; and	Accept in part	
PC5LWRP-665A	DairyNZ	Amend Rule 15B.5.45 matter of discretion (7) as follows: (7) Methods that limit the nitrogen loss calculation for the farming activity to a rate not exceeding the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP ; and	Accept in part	
PC5LWRP-665B	DairyNZ	Amend Rule 15B.5.45 matter of discretion (8) as follows: (8) Methods that require the farming activity to operate at or below the Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice , in any circumstance where that Good Management Practice Loss Rate or Loss Rate Assessed as Good Management Practice is less than the agricultural load limit, calculated in accordance with Schedule 27; and	Accept in part	
PC5LWRP-2100A	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.45 matters of discretion (8) as follows: (8) Methods that require the farming activity to operate at or below the greater of the Good	Accept in part	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Management Practice Loss Rate and the Loss Rate Assessed as Good Management Practice, in [*any*] circumstance[*s*] where [*that*] the greater of the Good Management Practice Loss Rate and the Loss Rate Assessed as Good Management Practice is less than the greater of the [*Baseline GMP Loss Rate*] and the Loss Rate Assessed as Baseline GMP.		
PC5LWRP-2100B	Fonterra Co-operative Group Ltd	Amend Rule 15B.5.45 matters of discretion (9) as follows: (9) Methods to ensure compliance with the Good Management Practice Loss Rates or Loss Rates Assessed as Good Management Practice for the farming activity, inclusive where relevant, of any nitrogen received from any industrial discharge... AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	
PC5LWRP-665C	DairyNZ	Amend Rule 15B.5.45 matter of discretion (9) as follows: (9) Methods to ensure compliance with the Good Management Practice Loss Rates or Loss Rates Assessed as Good Management Practice for the farming activity, inclusive where relevant, of any nitrogen received from any industrial discharge; and Or words to similar effect.	Reject	
PC5LWRP-1005B	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Amend Rule 15B.5.45 by including an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property fulfil Policy 15B.4.xx;	Reject	
PC5LWRP-1956B	Forest and Bird NZ	Amend Rule 15B.5.45 by including an additional matter of discretion as follows: Until biodiversity provisions in a district plan are notified post 13 February 2016, the extent to which the proposal avoids or mitigates any adverse effects on any areas of significant indigenous biodiversity.	Reject	
PC5LWRP-2755A	Director General of Conservation	Amend Rule 15B.5.45 by including an additional matter of discretion as follows: Methods to protect significant indigenous terrestrial biodiversity and habitat until the requirements of Policy 15B.4.23 (b) are met, and And further or alternative relief to like effect to that sought.	Reject	
PC5LWRP-2755B	Director General of Conservation	Amend Rule 15B.5.45 by including an additional matter of discretion as follows: Methods to protect significant indigenous freshwater biodiversity and habitat And further or alternative relief to like effect to that sought.	Reject	

Rule 15B.5.46

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1711	Fertiliser Association of New Zealand	Retain Rule 15B.5.46 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-1958	Forest and Bird NZ	Retain Rule 15B.5.46 as notified.	Accept in part	
PC5LWRP-2423	Federated Farmers of New Zealand	Retain Rule 15B.5.46 as notified.	Accept in part	
PC5LWRP-2220	Ravensdown Limited	Retain the discretionary activity status of Rule 15B.5.46.	Accept in part	
PC5LWRP-666	DairyNZ	Amend Rule 15B.5.46 to provide for a Restricted Discretionary consent pathway, with the	Reject	

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		Matters for Discretion similar to those outlined in PC5LWRP-665 (Rule 15B.5.45).		
PC5LWRP-2168	Fonterra Co-operative Group Ltd	Amend Rule 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: 1. The commencement date for the first audit of the Farm Environment Plan; and 2. The content, quality and accuracy of the OVERSEER® budgets provided with the application for resource consent; and 3. The timing of any actions or good management practices proposed to achieve the objectives and targets described in Schedule 7; and 4. The extent to which any parcel of land within the farming enterprise may exceed the Baseline GMP Loss Rate; and 5. Methods that limit the nitrogen loss calculation for the farming enterprise to a rate that will not cause the applicable load limit calculated in accordance with Schedule 27 to be exceeded; and 6. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 7. Methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; 8. Reporting of nutrient losses and audit results of the Farm Environment Plan to the Canterbury Regional Council; and 9. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan. AND make any further or other consequential or alternative relief as necessary to fully give effect to the relief sought.	Reject	
PC5LWRP-1414	McFadden J R	Delete the mandatory approach and auditing requirements for management plans and FEPs in Rule 15B.5.46, and replace with a catchment board type model similar to Taranaki. Also address the issue of misuse of private property information.	Reject	
PC5LWRP-2220A	Ravensdown Limited	If the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715 are resolved: Amend Rule 15B.5.46 to: • Address the issues associated with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715; • Provide for an alternative pathway in addition to that provided by the portal, and for farms that cannot be modelled; • Provide for an additional formal process for reviewing and moderating inaccurate portal results; • Embed the GMP loss rate within the FEP process, rather than using this as a basis for granting a consent.	Accept in part	
PC5LWRP-2220B	Ravensdown Limited	Amend Rule 15B.5.46(1) to require the FEP to be prepared by an Accredited Farm Advisor and the nutrient budget accompanying the FEP to be prepared by a Certified Nutrient Management Advisor; Or such other or alternative wording which would properly address the concerns raised.	Reject	

Rule 15B.5.47

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1959	Forest and Bird NZ	Retain Rule 15B.5.47 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-2424	Federated Farmers of New Zealand	Retain Rule 15B.5.47 as notified.	Accept in part	
PC5LWRP-1712	Fertiliser Association of New Zealand	Amend Rule 15B.5.47 from a non complying activity to a discretionary activity.	Reject	
PC5LWRP-2221	Ravensdown Limited	Amend Rule 15B.5.47 from a non-complying to a discretionary activity.	Reject	
PC5LWRP-1088	DairyNZ	Amend Rule 15B.5.47 as follows: Within the Whitneys Creek Zone, the use of land for a farming activity on a property greater than 10 hectares in area that does not meet condition 1 of Rule 15B.5.44, or condition 1 or 2 of Rule 15B.5.45, or the use of land for a farming activity as part of a farming enterprise that does not comply with condition 1, 2 or 3 of Rule 15B.5.46, is a non-complying activity. Or words to similar effect.	Reject	

Rule 15B.5.48

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1960	Forest and Bird NZ	Retain Rule 15B.5.48 as notified.	Accept in part	We are recommending omitting this rule as recommended by the Section 42A Report. This would result in the contents of this rule as notified being merged into other rules subject to our recommended changes in response to these submissions.
PC5LWRP-1094	DairyNZ	Delete Rule 15B.5.48 and farming activities which do not meet condition 2 of Rule 15B.5.45 or condition 2 or 3 of Rule 15B.5.46 default to a non-complying activity under Rule15B.5.47.	Reject	
PC5LWRP-1713	Fertiliser Association of New Zealand	Amend Rule 15B.5.48 from a prohibited activity to a discretionary activity.	Reject	
PC5LWRP-2222	Ravensdown Limited	Amend Rule 15B.5.48 from a prohibited activity to a discretionary activity.	Reject	
PC5LWRP-2418	Federated Farmers of New Zealand	Amend Rule 15B.5.48 from a prohibited to a non complying activity.	Reject	
PC5LWRP-2222A	Ravensdown Limited	Amend to provide for farm systems which cannot use the Farm Portal to generate a GMP N loss value or a Baseline GMP N loss value.	Accept in part	

Rule 15B.5.49 (now recommended Rule 15B.5.38)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1961	Forest and Bird NZ	Retain Rule 15B.5.49 as notified.	Accept	We agree that retaining this rule is appropriate.

Rule 15B.5.50 (now recommended Rule 15B.5.39)

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1962	Forest and Bird NZ	Retain Rule 15B.5.50 as notified.	Accept	We agree that retaining this rule is appropriate.

Table 15B(a) - Freshwater Outcomes for Waitaki Rivers

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2223	Ravensdown Limited	Retain Table 15B(a) as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1720	Fertiliser Association of New Zealand	Retain Table 15B(a) subject to further scrutiny.		
PC5LWRP-442	Omarama Station Ltd	Retain table 15B(a) as notified.		
PC5LWRP-1340A	Canterbury District Health Board	Retain recommended values for *E.coli in* Table 15B (a) has notified.	Accept	We agree that retaining the *E.coli* values is appropriate.
PC5LWRP-361	DairyNZ	Amend Table 15B(a) as follows: ~~Macrophyte Attributes~~ and replace with Ecological Health Attributes ~~Periphyton Attributes~~ and replace with Ecological Health Attributes ~~Siltation Attribute~~ and replace with Ecological Health Attributes	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2673	Lower Waitaki River Management Soc Inc	Amend Table 15B(a) nitrogen limits to be close to the ANZEEC guideline limit for lowland waterways of 0.44mg/l nitrate nitrogen and 0.61 mg/l total nitrogen pr less than 0.8 mg/l DIN set in the Ruataniwha Board Inquiry decision.		
PC5LWRP-1963	Forest and Bird NZ	Amend Table 15B(a) so that Dissolved Oxygen is not set below 80%.	Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-766	Central South Island Fish and Game Council	Amend Table 15B(a) to include: • Dissolved oxygen should not fall below 80% saturation. The submitter seeks amendments to Dissolved Oxygen for the Valley and Tributaries Spring-fed plains and the Northern Fan Catchment Spring-fed plains.		
PC5LWRP-111	Meridian Energy Limited	Amend Table 15B(a) Ecological Health Attributes as follows: Dissolved oxygen (min saturation [%])- Daily median or equivalent.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2029	Genesis Energy Limited	Amend Table 15B(a) Ecological Health Attributes as follows: Dissolved oxygen (min saturation [%])- Daily median or equivalent.		
PC5LWRP-111C	Meridian Energy Limited	Amend Table 15B(a) Ecological Health Attributes as follows: Temp. (Max) [degrees C] 90th percentile for daily max assessed on an annual basis.		
PC5LWRP-2029B	Genesis Energy Limited	Amend Table 15B(a) Ecological Health Attributes as follows: Temp. (Max) [degrees C] 90th percentile for daily max assessed on an annual basis.		
PC5LWRP-2673A	Lower Waitaki River Management Soc Inc	Amend Table 15B(a) the maximum daily temperature during summer (October to April exclusive) be no greater than 19 degrees and during the winter no greater than 11 degrees.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-766A	Central South Island Fish and Game Council	Amend Table 15B(a) to include temperature. Max should be set at 19°C (Oct-Apr) and 11°C during spawning times (May-Sept)		
PC5LWRP-766B	Central South Island Fish and Game Council	Amend Table 15B(a) to include Upper Waitaki Chlorophyll a value to 120.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2673B	Lower Waitaki River Management Soc Inc	Amend the chlorophyll max biomass to reflect the Biggs (2000) periphyton guidelines of 50mg/m2 for upland and 120 mg/m2 for lowland and plains streams.		
PC5LWRP-1963A	Forest and Bird NZ	Amend Table 15B(a). Chlorophyll A should not be set above 120.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-111A	Meridian Energy Limited	Amend Table 15B(a) Siltation Attribute as follows: Fine sediment <2mm diameter [max cover of bed] [%] Excludes rivers naturally influenced by glacial flow.		
PC5LWRP-2029A	Genesis Energy Limited	Amend Table 15B(a) Siltation Attribute as follows: Fine sediment <2mm diameter [max cover of bed] [%] Excludes rivers naturally influenced by glacial flow. Or words to the same effect.		
PC5LWRP-1340	Canterbury District Health Board	Amend Table 15B(a) to include values for cyanobacteria mat cover at values below 50% [for all other river types that are not alpine, hill-fed, spring-fed upland rivers].	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-361A	DairyNZ	Amend E.coli [E.coli/ 100ml] 95th percentile value for rivers categorised as Lake fed, Spring- fed upland, Hill fed lower and Lake- fed as follows: ~~<260~~<540	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-155	Killermont Station 2012 Limited	Amend Table 15B(a) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-980	Rietveld J A	Amend Table 15B(a) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-1110	Twinburn Ltd	Amend Table 15B(a) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-1131	Haldon Station Limited	Amend Table 15B(a) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-2017	Bellfield Land Co Ltd	Amend Table 15B(a) if needed. Confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules. Rule 15B.5.45(12) condition 12 for Whitneys Creek zone is an example of how this can be achieved in the rules. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-111B	Meridian Energy Limited	Amend Table 15B(a) by inserting a new footnote: 6 Excludes the Upper Ohau River to the extent that the achievement of any outcome in this waterbody is affected by the effects of existing hydroelectricity infrastructure on river flows. Or words to the same effect.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-361B	DairyNZ	Amend Table 15B(a) by inserting a new footnote to 'QMCI Scores' as follows: 80% of samples over a five year period have to meet this minimum outcome.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1451	Mackenzie Irrigation Company Ltd	Clarify whether levels set in Table 15B(a) are set on actual water quality data, whether they are realistic and achievable and how they apply and integrate to the rules.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1179	Omarama Stream Water Users Group	Clarify that the levels set in Table 15B(a) are based on actual water quality data and are realistic and achievable; AND any related objective, policy or rule that alters as a result of our submission or any other submissions made.		

Table 15B(b) Freshwater Outcomes for Lakes in the Upper Waitaki Freshwater Management Unit

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1721	Fertiliser Association of New Zealand	Retain Table 15B(b) subject to further scrutiny.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-445	Omarama Station Ltd	Retain table 15B(b) as notified.		
PC5LWRP-2756	Ravensdown Limited	Retain Table 15B(b) water quality and nitrogen load limits as notified, subject to further scrutiny and use in PC5 provisions.		
PC5LWRP-2030B	Genesis Energy Limited	Amend Table 15B(b) 'Large High Country Lakes', 'Lake SPI' attribute as follows: Excellent. Excludes lakes naturally influenced by glacial flour.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-116B	Meridian Energy Limited	Amend Table 15B(b) 'Large High Country Lakes', 'Lake SPI' attribute as follows: Excellent. Excludes lakes naturally influenced by glacial flour.		
PC5LWRP-116C	Meridian Energy Limited	Include an additional 'Colour' of 'Large High Country Lakes' and 'Small to medium sized high country lakes' as follows: Lakes are maintained in a natural state. Or words to similar effect.		
PC5LWRP-2030C	Genesis Energy Limited	Amend Table 15B(b) by including an additional 'Colour' of 'Large High Country Lakes' and 'Small to medium sized high country lakes' as follows: Lakes are maintained in a natural state. Or words to similar effect.		
PC5LWRP-116A	Meridian Energy Limited	Amend Table 15B(b) as follows: provide for an outcome TLI Kellands Pond and Wairepo Arm of a maximum of 3.2, or any less (high water quality) TLI.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1614	Director General of Conservation	Amend Table 15B(b) to include an outcome TLI for Kellands Pond and Wairepo Arm of <3.3	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-495	Campbell A	Amend Table 15B(b) to achieve a reduction in the Trophic Level Index for Kellands Pond and Wairepo Arm	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-768	Central South Island Fish and Game Council	Amend Table 15B(b) to include Kellands Pond and Wairepo Arm TLI 3.2		
PC5LWRP-2030A	Genesis Energy Limited	Amend to provide for an outcome TLI Kellands Pond and Wairepo Arm of a maximum of 3.2, or any less (high water quality) TLI.		
PC5LWRP-2674	Lower Waitaki River Management Soc Inc	Amend the Annual median and 95th percentile to not exceed 0.8mg/l.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1964	Forest and Bird NZ	Amend Table 15B(b) to ensure targets ensure ecological health is achieved.		
PC5LWRP-950	Killermont Station 2012 Limited	Amend Table 15B(b) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-981	Rietveld J A	Amend Table 15B(b) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-1111	Twinburn Ltd	Amend Table 15B(b) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1132	Haldon Station Limited	Amend Table 15B(b) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-2018	Bellfield Land Co Ltd	Amend Table 15B(b) if needed. Confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules. Rule 15B.5.45(12) condition 12 for Whitneys Creek zone is an example of how this can be achieved in the rules. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-768A	Central South Island Fish and Game Council	Amend Table 15B(b) to include Lake Ruataniwha in Table 15B(b) TLI 1.7	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1614A	Director General of Conservation	Amend Table 15B(b) to include an outcome TLI of 1.7 for Lake Ruataniwha.		
PC5LWRP-2030	Genesis Energy Limited	Amend Table 15B(b) to ensure Lake Ruataniwha is included as an Artificial lake - on-river with the same outcomes as for Lake Benmore at Haldon Arm - other than the TLI for Lake Ruataniwha is to be set at 1.7, being consistent with the source lakes of Lakes Tekapo, Pukaki and Ohau.		
PC5LWRP-116	Meridian Energy Limited	Amend Table 15B(b) as follows: ensure Lake Ruataniwha is included as an Artificial lake - on-river with the same outcomes as for Lake Benmore at Haldon Arm - other than the TLI for Lake Ruataniwha is to be set at 1.7, being consistent with the source lakes of Lakes Tekapo, Pukaki and Ohau. The measurement location shall be at the Ruataniwha Dam.		
PC5LWRP-1181	Omarama Stream Water Users Group	Clarify that the levels set in Table 15B(b) are based on actual water quality data and are realistic and achievable.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-1455	Mackenzie Irrigation Company Ltd	Clarify whether levels set in Table 15B(b) are set on actual water quality data, whether they are realistic and achievable and how they apply and integrate to the rules.		
PC5LWRP-1757	Lower Waitaki River Management Soc Inc	Submitter concerned about the sheer complexity of nutrient management under this suite of proposed objectives, policies, rules and methods. Submitter considers that plan should be simplified.		

Table 15B(c): Water Quality Limits for Waitaki Rivers

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-446	Omarama Station Ltd	Retain table 15B(c) as notified.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1610	Director General of Conservation	Retain Table 15B(c) as notified.		
PC5LWRP-1722	Fertiliser Association of New Zealand	Retain Table 15B(c) subject to further scrutiny.	Accept in part	We have given the table further scrutiny.
PC5LWRP-2224	Ravensdown Limited	Retain Table 15B(c) water quality and nitrogen load limits as notified, subject to further scrutiny and use in PC5 provisions.		
PC5LWRP-1182	Omarama Stream Water Users Group	Explain how the levels have been set for the Omarama Stream and how they are integrated into the rules; Clarify that the levels set in Table 15B(c) are based on actual water quality data and are realistic	Reject	A general request which does not give precise details of amendments requested.

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		and achievable.		
PC5LWRP-1966	Forest and Bird NZ	Amend Table 15B(c) so the nitrate nitrogen annual median concentration does not exceed 0.4mg/L in the following areas: Upper Waitaki – Spring Fed Upland -Willowburn Quailburn Rd: map reference 1359156 5072727.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1966A	Forest and Bird NZ	Amend Table 15B(c) so the nitrate nitrogen annual median concentration does not exceed 0.4mg/L in the following areas: Valley and Tributaries - Spring fed plains - Penticotico Stream: map reference 1413126 5034783.		
PC5LWRP-1155	Cameron W N and S P	Amend Table 15B(c) to replace the current limits for the Penticotico Stream with those in Schedule 8 of the LWRP.		
PC5LWRP-2735	Cameron W N and S P	Amend Table 15B(c) so that in the interim the Nitrate-Nitrogen limits for the Penticotico Stream are the same as those provided in Schedule 8 of the LWRP.		
PC5LWRP-1966B	Forest and Bird NZ	Amend Table 15B(c) so the nitrate nitrogen annual median concentration does not exceed 0.4mg/L in the following areas: Northern Fan - Spring fed plains -Whitneys Creek: map reference 1451757 5026547		
PC5LWRP-1966C	Forest and Bird NZ	Amend Table 15B(c) so the nitrate nitrogen annual median concentration does not exceed 0.4mg/L in the following areas: [*Waikākahi Stream at Te Maiharoa*] Rd: map reference 1449636 5024541.		
PC5LWRP-1133A	Haldon Station Limited	Amend Table 15B(c) so the DRP and other nutrient limits for lower Stony River more fairly reflect actual baseline water quality.		
PC5LWRP-951	Killermont Station 2012 Limited	Amend Table 15B(c) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules for example Rule 15B.5.45(12) for Whitneys Creek Zone.	Reject	A general request which does not give precise details of amendments requested.
PC5LWRP-982	Rietveld J A	Amend Table 15B(c) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-1112	Twinburn Ltd	Amend Table 15B(c) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules, for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-1133	Haldon Station Limited	Amend Table 15B(c) to confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules for example Rule 15B.5.45(12) for Whitneys Creek Zone.		
PC5LWRP-2020	Bellfield Land Co Ltd	Amend Table 15B(c) if needed. Confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules. Rule 15B.5.45(12) condition 12 for Whitneys Creek zone is an example of how this can be achieved in the rules. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-1457	Mackenzie Irrigation Company Ltd	Clarify whether levels set in Table 15B(c) are set on actual water quality data, whether they are realistic and achievable and how they apply and integrate to the rules.		

Table 15B(d): Water Quality Limits for Lakes in the Upper Waitaki Freshwater Management Unit

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1725	Fertiliser Association of New Zealand	Retain Table 15B(d) subject to further scrutiny.	Accept in part	We have given the table further scrutiny and are recommending some amendments.
PC5LWRP-1967	Forest and Bird NZ	Retain Table 15B(d) as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-447	Omarama Station Ltd	Retain table 15B(d) as notified		
PC5LWRP-2757	Ravensdown Limited	Retain Table 15B(d) water quality and nitrogen load limits as notified, subject to further scrutiny and use in PC5 provisions.	Accept in part	We have given the table further scrutiny and are recommending some amendments.
PC5LWRP-1671C	Director General of Conservation	Amend Table 15B(d) values for Kellands Pond as follows: • <3.3 TLI [3rd column 3rd row] • TP<20 [4th column 2nd row] • TN<350 [5th column 3rd row] • Chl-a <2 (annual median) [6th column 3rd row] • Chl-a <10 (annual maximum) [7th column 3rd row]	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-350	Becker M	Amend Table 15B(D) to ensure the TLI trigger levels do not create equity issues in the Ahuriri Zone. Submitter seeks clear direction in PC5 that consents can be easily changed to align with the agreed levels set in PC5.		
PC5LWRP-1671	Director General of Conservation	Amend Table 15B(d) as follows: Lake Alexandrina delete TN of 350 and replace with ~ 250 [5th column 3rd row] And further or alternative relief to like effect to that sought.		
PC5LWRP-1671A	Director General of Conservation	Amend Table 15B(d) as follows: Lake McGregor delete TP of <20 and replace with 10 [4th column 2nd row].		
PC5LWRP-1671B	Director General of Conservation	Amend Table 15B(d) as follows: Lake Middleton delete TLI of 3.6 and replace with <3.3 [3rd column 5th row].		
PC5LWRP-952 PC5LWRP-1113 PC5LWRP-1134 PC5LWRP-2032	Killermont Station 2012 Limited Twinburn Ltd Haldon Station Limited Bellfield Land Co Ltd	Amend Table 15B(d) to align the TLI for the Ahuriri and Haldon Arms of Lake Benmore to that imposed in conditions of consent, OR; Amend to create a consenting pathway as a controlled activity to enable those who wish to change their NDA to align with PC5.		
PC5LWRP-984	Rietveld J A	Amend Table 15B(d) to determine what the appropriate TLI level for the Lake should be and align the TLI for the Haldon Arm of Lake Benmore to that imposed in conditions of consent [submitter has noted the TLI set in consents is 2.75], OR Amend to create a consenting pathway as a controlled activity to enable those who wish to change their NDA to align with PC5.		
PC5LWRP-1467	Mackenzie Irrigation Company Ltd	Amend Table 15B(d) to achieve consistency by aligning the TLI for the Ahuriri and Haldon Arms of Lake Benmore to that imposed in conditions of consent, or create a consenting pathway as a controlled activity to enable those who wish to change their Nitrogen Discharge Allowances to align with PC5, in order to reduce issues associated with equity.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1671D	Director General of Conservation	Amend Table 15B(d) by inserting the following water quality limits for Lake Ruataniwha • TLI 1.7 • TP < 10 • TN <160 • Chl-a< 2(annual median), and < 10 (annual maximum)	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-121	Meridian Energy Limited	Amend Table 15B(d) as follows: Include Lake Ruataniwha as an Artificial Lake – on-river with the same limits as for Lake Benmore at Haldon Arm – other than the TLI for Lake Ruataniwha is to be set at 1.7. The measurement location shall be at the Ruataniwha Dam.	Accept in part	
PC5LWRP-771	Central South Island Fish and Game Council	Amend Table 15B(d) to include: Lake Ruataniwha TLI 1.7 TP <10 TN<160 Chlorophyll a: Annual median <2 Annual maximum <10	Accept in part	
PC5LWRP-771A	Central South Island Fish and Game Council	Amend Table 15B(d) to include: Kellands Pond and Wairepo Arm TLI 3.2 TP <20 TN <350 Chlorophyll a: Annual median <2 Annual maximum <10	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-121A	Meridian Energy Limited	Amend Table 15B(d) to provide for Kellands Pond (map reference: 1365979 5090899) and Wairepo Arm (map reference 1366937 5090850) to have: TLI: 3.2 TP: <20 TN: <350 Chl-a: <2 (annual median), <10 (annual maximum) Ammoniacal Nitrogen: <0.03 (annual median), <0.05 (annual maximum) or better (stricter water quality limits). Or words to similar effect.	Accept in part	

Table 15B(e): Water Quality Limits for Waitaki Groundwater

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-469	Omarama Station Ltd	Retain table 15B(e) as notified.	Accept	We agree that retaining the table is appropriate.
PC5LWRP-1968	Forest and Bird NZ	Retain Table 15B(e) as notified.	Accept	We agree that retaining the table is appropriate.
PC5LWRP-1728	Fertiliser Association of New Zealand	Retain Table 15B(e) subject to further scrutiny.	Accept	We have given the table further scrutiny.
PC5LWRP-2758	Ravensdown Limited	Retain water quality and nitrogen load limits in Table 15B(e) as notified, subject to further scrutiny and use in PC5 provisions.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1156	Cameron W N and S P	Amend Table 15B(e) to replace the groundwater limits for the Valley and Tributaries, Mid-Waitaki North Banks with those in Schedule 8 of the LWRP. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2736	Cameron W N and S P	Amend Table 15B(e) limit for the Mid Waitaki North Bank until further information through sustained monitoring programme is obtained a groundwater target of 50% MAV for Nitrate-Nitrogen should be applied.		
PC5LWRP-954	Killermont Station 2012 Limited	Amend Table 15B(e) to confirm that levels set are correct and achievable, and how they apply and integrate to the rules.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-986	Rietveld J A	Amend Table 15B(e) to confirm that levels set are correct and achievable, and clarify how they apply and integrate to the rules.		
PC5LWRP-1115	Twinburn Ltd	Amend Table 15B(e) if needed and confirm that levels set are correct and achievable, and how they apply and integrate to the rules.		
PC5LWRP-1136	Haldon Station Limited	Amend Table 15B(e) to confirm that levels set are correct and achievable, and how they apply and integrate to the rules.		
PC5LWRP-2040	Bellfield Land Co Ltd	Amend Table 15B(e) if needed. Confirm that levels set are correct and achievable and clarify how they apply and integrate to the rules.		
PC5LWRP-1556	Mackenzie Irrigation Company Ltd	Clarify whether the levels set in Table 15B(e) are set on actual water quality data, whether they are realistic and achievable and how they apply and integrate to the rules.		

Table 15B(f): Waitaki Nitrogen Load Limits

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-470	Omarama Station Ltd	Retain table 15B(f) as notified.	Accept	We agree that retaining the table is appropriate.
PC5LWRP-773	Central South Island Fish and Game Council	Retain Table 15B(f) as notified.		
PC5LWRP-1611	Director General of Conservation	Retain Table 15B(f) as notified.		
PC5LWRP-1729	Fertiliser Association of New Zealand	Retain Table 15B(f) subject to further scrutiny.	Accept	We have given the table further scrutiny.
PC5LWRP-1969	Forest and Bird NZ	Retain Table 15B(f) limits but ensure they are set at a level that ensures that water quality limits are met.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-2759	Ravensdown Limited	Retain Table 15B(f) water quality and nitrogen load limits as notified, subject to further scrutiny and use in PC5 provisions.	Accept	We have given the table further scrutiny.
PC5LWRP-955	Killermont Station 2012 Limited	Amend Table 15B(f) to confirm that the loads are correctly determined and the ability to enforce these [with policies and rules] is clearly achievable.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-991	Rietveld J A	Amend Table 15B(f) to confirm that the loads are correctly determined and the ability to enforce these is clearly achievable.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1116	Twinburn Ltd	Amend Table 15B(f) if needed and confirm that the loads are correctly determined and the ability to enforce these [with policies and rules] is clearly achievable.		
PC5LWRP-1137	Haldon Station Limited	Amend Table 15B(f) to confirm that the loads are correctly determined and the ability to enforce these is clearly achievable.		
PC5LWRP-2041	Bellfield Land Co Ltd	Amend Table 15B(f) if needed. Confirm that the loads-are correctly determined and the ability to enforce these is clearly achievable. AND amend to encompass any related objective, policy or rule that alters as a result of this submission or any other submission.		
PC5LWRP-1559	Mackenzie Irrigation Company Ltd	Clarify whether the loads in Table 15B(f) are correctly and accurately determined and which have the ability to enforce those which are clearly achievable.		

Table 15B(g): Nitrogen Load Limits for Industrial Discharges

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-471	Omarama Station Ltd	Retain table 15B(g) as notified.	Accept	We agree that retaining this table is appropriate.
PC5LWRP-1731	Fertiliser Association of New Zealand	Retain Table 15B(g) subject to further scrutiny.	Accept	We have given the table further scrutiny.
PC5LWRP-1970	Forest and Bird NZ	Retain Table 15B(g) limits but ensure they are set at a level that ensures that water quality limits are met.	Accept	We adopt the recommendations and reasons set out in the Section 42A Report.

Table 15B(h): Nitrogen Load Limits for Community Wastewater Discharges and Aquaculture

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-472	Omarama Station Ltd	Retain table 15B(h) as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1612	Director General of Conservation	Retain Table 15B(h) as notified.		
PC5LWRP-1732	Fertiliser Association of New Zealand	Retain Table 15B(h) subject to further scrutiny.	Accept in part	We have given the table further scrutiny and are recommending amendments accordingly.
PC5LWRP-1971	Forest and Bird NZ	Retain Table 15B(h) limits but ensure they are set at a level that ensures that water quality limits are met.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.

PC5LWRP-368	Mackenzie District Council	Amend Table 15B(h) to include the contributing discharges breakdown to the Haldon Zone as follows:
		a) Tekapo Township= 22 tN/yr;
		b) Twizel Township= 18 tN/yr;
		c) Aoraki Cook Village= 3.5 tN/yr
			Accept	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.

PC5LWRP-368A	Mackenzie District Council	Amend Table 15B(h) to ensure the community wastewater load limit is restricted to council-owned systems.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.

Table 15B(i): Whitneys Creek Environmental Flow Regime

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-474	Omarama Station Ltd	Retain table 15B(i) as notified.	Accept	We agree that retaining the table as notified is appropriate.
PC5LWRP-1613	Director General of Conservation	Retain Table 15B(i) as notified.		
PC5LWRP-1733	Fertiliser Association of New Zealand	Retain Table 15B(i) subject to further scrutiny.	Accept	We have given the table further scrutiny and consider it appropriate.

Table 15B(j) Waitaki Groundwater Limits

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-476	Omarama Station Ltd	Retain table 15B(j) as notified.	Accept	We agree that retaining the table as notified is appropriate.
PC5LWRP-1734	Fertiliser Association of Few Zealand.	Retain Table 15B(j) subject to further scrutiny.		We have given the table further scrutiny and consider it appropriate.

Table 15B.9 Flow Sensitive Catchments

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1714	Director General of Conservation	Retain table of Flow Sensitive Catchments as notified.	Accept	We agree that retaining the table as notified is appropriate.

Schedule 7 Farm Environment Plan Amendments

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1354	Canterbury District Health Board	Retain Schedule 7, Section 8 'Waitaki - Additional Requirements' as notified.	Accept	We agree that retaining the schedule as notified is appropriate.
PC5LWRP-1006	Ngā Rūnanga, Te Rūnanga o Ngāi Tahu & Ngāi Tahu Farming Limited	Retain Schedule 7 Farm Environment Plan Amendment 'Management area Mahinga Kai' as notified.		
PC5LWRP-1682	Director General of Conservation	Retain Schedule 7 Management Area: Mahinga kai objectives and targets as notified.		
PC5LWRP-667	DairyNZ	Delete Waitaki specific amendments to Schedule 7.	Reject	The amendments requested would unjustifiably weaken the provision and reduce its effectiveness in achieving the objectives of the LWRP, and for giving effect to the superior instruments.
PC5LWRP-1972	Forest and Bird NZ	Amend Schedule 7 to provide a new policy to make clear that indigenous biodiversity should be maintained for in stream values generally and not only for mahinga kai.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1972A	Forest and Bird NZ	Amend Schedule 7 Management Area: Mahinga Kai Target(1)(d) to refer to the Regional Pest Management Strategy.		
PC5LWRP-1682A	Director General of	Amend Schedule 7 Management Area: Instream Biodiversity Values Objective as follows:		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
	Conservation	To protect and enhance in-stream biodiversity values and avoid adverse effects on threatened fish species.		
PC5LWRP-1682B	Director General of Conservation	Insert new Schedule 7 Management Area: Instream Biodiversity Values Targets as follows: 3. Enable access to enable management agencies to monitor populations of threatened native fish to ensure the sustainability of their population and range. 4. Fence out spring heads and spring-fed streams to sustain threatened fish populations and fish habitat. 5. Fence out waterways from all stock and provide a riparian buffer to mitigate the effects of P, N, E.coli, and suspended sediment; And further or alternative relief to like effect to that sought.		

Schedule 26 Aquaculture Environment Plan

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-668	DairyNZ	Retain Schedule 26 as notified.	Accept	We agree that retaining the schedule as notified is appropriate.

Schedule 27 On-Land Nitrogen Load Conversion -

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-2225	Ravensdown Limited	Retain Schedule 27 as notified, but address issues with the Farm Portal raised in PC5LWRP-2719 and PC5LWRP-2715.	Accept in part	We recommended retaining the schedule subject to amendments in response to other submissions.
PC5LWRP-1715	Fertiliser Association of New Zealand	Retain Schedule 27 and associated reference maps.	Accept in part	
PC5LWRP-1350	Pukaki Tourism Holdings LP	Retain Schedule 27 allowance for nitrogen headroom to be spread evenly over the applicable 172,000 hectares in the Haldon zone	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-58	Meridian Energy Limited	Amend Schedule 27 to ensure that the total Nitrogen load limits for the Haldon and Mid-Catchment Zones are not exceeded as a result of any individual or combination of land-based Nitrogen losses.	Accept	In response to this and other submissions we recommend an amendment to the formulae in Schedule 27 to the effect requested, for the reasons in the original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1979	Genesis Energy Limited	Amend Schedule 27 to ensure the total Nitrogen load limits for the Haldon and Mid- Catchment Zones are not exceeded as a result of any individual or combination of land-based Nitrogen losses.		
PC5LWRP-58A	Meridian Energy Limited	Amend Schedule 27 to ensure that the Upper Waitaki Nitrogen Headroom available per property at any time has taken into account the Nitrogen losses associated with any existing consent granted, existing consent already lodged with Environment Canterbury, potential consents that could be lodged, and any property allowance with additional Nitrogen losses. Or words to similar effect.	Accept in part	Schedule 27 as notified uses an equal allocation method to allocate the Upper Waitaki Nitrogen Headroom and a first in first served allocation method for the Valley and Tributaries and Whitneys Creek Zones. We recommend amendments to the formulae in Schedule 27 to take account of any current appeals that may be upheld to ensure the catchment loads are not exceeded.
PC5LWRP-1979A	Genesis Energy Limited	Amend Schedule 27 to ensure the Upper Waitaki Nitrogen Headroom available per property at any time has taken into account the Nitrogen losses associated with any existing consent granted, existing consent already lodged with Environment Canterbury, potential consents that could be lodged, and any property allowance with additional Nitrogen losses. Or words to similar effect.		
PC5LWRP-992A	Rietveld J A	Amend Schedule 27 to ensure the equal allocation of the nitrogen head-room, and that over-allocation does not occur for those not first in.		

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-956A	Killermont Station 2012 Limited	Amend Schedule 27 to ensure the equal allocation of the nitrogen head-room, and that over-allocation does not occur for those not first in.		
PC5LWRP-1117A	Twinburn Ltd	Amend Schedule 27 to provide for resource consents that are still in appeal or not physically irrigating and ensure the Upper Waitaki headroom is equally allocated.	Reject	These submission points request amendments to Plan Change 5 but do not give precise details of amendments requested. In response to other similar submissions we recommend amendments to the formula in Schedule 27 to take account of applications for resource consents that are under appeal and which may subsequently be granted.
PC5LWRP-1138A	Haldon Station Limited	Amend Schedule 27 to provide for resource consents that are still in appeal or not physically irrigating and ensure the Upper Waitaki headroom is equally allocated.		
PC5LWRP-956	Killermont Station 2012 Limited	Amend Schedule 27 to ensure the formula of accurately reflects existing and consented land use, and provision is made for those consents not yet granted, whom are still in appeal or not yet physically irrigating.		
PC5LWRP-992	Rietveld J A	Amend Schedule 27 to ensure the formula accurately reflects existing and consented land use, and provision is made for those consents not yet granted, who are still in appeal or not yet physically irrigating.		
PC5LWRP-1138	Haldon Station Limited	Amend Schedule 27 to ensure the formula of accurately reflects existing and consented land use, and provision is made for those consents not yet granted, whom are still in appeal or not yet physically irrigating.		
PC5LWRP-1117	Twinburn Ltd	Amend Schedule 27 to ensure the formula accurately reflects existing and consented land use, and provision is made for those consents not yet granted, whom are still in appeal or not yet physically irrigating.		
PC5LWRP-2043	Bellfield Land Co Ltd	Amend Schedule 27 to ensure the formula of accurately reflects existing and consented land use, and provision is made for those consents not yet granted, whom are still in appeal or not yet physically irrigating.		
PC5LWRP-1569	Mackenzie Irrigation Company Ltd	Amend Schedule 27 to ensure a formula that accurately reflects existing and consented land use, and those whom are still in appeal or not physically irrigating yet.		
PC5LWRP-1448	Glentanner Station Limited	Amend Schedule 27 to include a formula that calculates the Haldon Zone headroom taking into account all existing and consented activities, including irrigation water permits that were granted/commenced after 13 February 2016.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1234	Benmore Irrigation Company Ltd - Shepherd B	Amend Schedule 27 to provide proof that the unutilised portion of 66 tonnes reflects the prior application of Benmore Irrigation Company Limited.		
PC5LWRP-1295	Ellis-Lea Farm	Amend Schedule 27 to clarify that the unutilised portion of 66 Tonnes reflects the prior application of Benmore Irrigation Company Limited.		
PC5LWRP-1302	Benmore Station	Amend Schedule 27 to provide proof that the unutilised portion of 66 Tonnes reflects the prior application of Benmore Irrigation Company Limited.		
PC5LWRP-1255	Twizel Dairy	Submitter opposes the available headroom in the Haldon Zone and requests the need to provide proof that the unutilised portion of 66 Tonnes reflects the prior application of Benmore Irrigation Company Limited.		
PC5LWRP-1198	West Edge	Submitter opposes the available headroom in the Haldon Zone and requests the need to provide proof that the unutilised portion of 66 Tonnes reflects the prior application of Benmore Irrigation Company Limited.		
PC5LWRP-1678	Director General of Conservation	Amend Schedule 27 to ensure nitrogen load limits are not exceeded and account for all consents granted, lodged or potentially lodged, including any permitted activity rules with additional	Accept in part	In response to this and other submissions we recommend an amendment to the effect requested, for the reasons in the

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
		nitrogen losses.		original submission or advanced in the evidence and legal submissions in support of original submissions.
PC5LWRP-1199	Morven Glenavy Ikawai Irrigation Co Ltd	Amend Schedule 27 as follows: Schedule 27 On-land Nitrogen Load Conversion The load limits in Table 15B(f) are calculated in-river or in-lake after attenuation has occurred. To establish what amount of nitrogen (t/yr) is available to consent applicants on land, nitrogen loads need to be converted to land based nitrogen loads. To calculate land based nitrogen loads the latest version of OVERSEER® needs to be used. ~~When a new version of OVERSEER® is released to the public, Environment Canterbury will adjust the land based load limits using the new version of OVERSEER® and the updated land based load limits will be published on the Environment Canterbury website.~~ ~~When a new version of OVERSEER® is released, Environment Canterbury will use the equations specified in Schedule 27 to determine the land based amount of nitrogen available for further intensification in the Haldon Zone, Mid Catchment Zone, Valley and Tributaries Zone and Whitneys Creek Zone.~~ ~~The equations to calculate the land based amount of nitrogen available for intensification include a set of fixed inputs (in-lake and in-river loads, and reference land uses). The equations also include a changing input, being the Matrix of Good Management loss rates, which change in response to OVERSEER® version updates.~~	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.
PC5LWRP-1678A	Director General of Conservation	Make consequential amendments to ensure Table 15B(f) nitrogen load limits are not exceed in: Definitions: Upper Waitaki Nitrogen Headroom Policies: 15B.4.16; 15B.4.18; 15B.4.20; 15B.4.21; 15B.4.22; Rules: 15B.5.8; 15B.5.9; 15B.5.10; 15B.5.20; 15B.5.21. And further or alternative relief to like effect to that sought.		
PC5LWRP-669	DairyNZ	DairyNZ supports the step towards the proportion of the catchment load attributed to farming activities being adjustable as the version changes of OVERSEER® occur. Request that CRC commit to a peer review of, and scenario testing for, the On-Land Nitrogen Load Conversion methodology to determine the potential impacts of OVERSEER® changes and the certainty this may give while planning changes in land use activities.	Accept in part	We adopt the recommendations and reasons set out in the Section 42A Report.

Waitaki Sub-region Maps

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-1717	Director General of Conservation	Retain all Waitaki Sub-region maps as notified.	Accept in part	Except to the extent that, in response to other submissions, we are recommending omissions or amendments to the notified provisions, we recommend that they are retained as notified.
PC5LWRP-1223	West Edge	Amend sensitive lake zone planning maps to ensure the planning maps are correct.		
PC5LWRP-1311	Benmore Station	Amend to correct planning maps and their catchment boundary definitions. -PMs A-101, A-095, A-094, A-100.	Accept in part	Provisions in the LWRP introduced by Plan Change 4 already address this matter.
PC5LWRP-1973	Forest and Bird NZ	Amend Part B Planning Maps to improve clarity of maps.	Reject	We are not persuaded that the planning maps are inaccurate so as to render them unfit for purpose.

Map 11 - Map Waitaki Sub-region Planning Map Series

Point ID	Submitter	Summary of Decision Requested	Recommendation	Reason for Recommendation
PC5LWRP-435	Balmoral and Mt John Station	Amend Waitaki Sub-region Planning Map 11 to include the correct watershed that flows into Lake Alexandria and provide correct map of Sensitive Lake Zone.	Reject	We adopt the recommendations and reasons set out in the Section 42A Report.