

**From:** [Lionel Hume](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 1 HWRRP Further Submission  
**Date:** Friday, 26 July 2019 3:44:29 PM  
**Attachments:** [FNZ Further Submission HWRRP PC1.pdf](#)

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Dear Sir/Madam,

Attached is Federated Farmers' further submission on Proposed Plan Change 1 to the Hurunui and Waiau River Regional Plan.

Yours sincerely,

**DR LIONEL HUME**  
SENIOR POLICY ADVISOR

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# Federated Farmers of New Zealand

## Further Submission on Proposed Plan Change 1 to the Hurunui and Waiau River Regional Plan

26 July 2019



# **FURTHER SUBMISSION TO ENVIRONMENT CANTERBURY ON PROPOSED PLAN CHANGE 1 TO THE HURUNUI AND WAIAU RIVER REGIONAL PLAN**

## Form 6

Further submission in support of, or in opposition to, submission on publicly notified  
proposed policy statement or plan

*Clause 8 of First Schedule, Resource Management Act 1991*

To: *Canterbury Regional Council  
PO Box 345  
Christchurch 8140*

Name of further submitter: North Canterbury Province, Federated Farmers of New Zealand

Contact person: Dr Lionel Hume  
Senior Policy Advisor

Address for service: PO Box 414, Ashburton 7740 or lhume@fedfarm.org.nz

This is a further submission in response to submission/s made on the following: Proposed Plan Change 1 to the Hurunui and Waiau River Regional Plan.

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

Federated Farmers wishes to be heard in support of its further submission.

### **Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Forest & Bird	15.1	General	Oppose	Modelling has been done in a thorough and transparent way with involvement of the Zone Committee and Hurunui Science Stakeholder Group.
Forest & Bird	15.2	General	Oppose	Modelling has been done in a thorough and transparent way with involvement of the Zone Committee and Hurunui Science Stakeholder Group.
Forest & Bird	15.3	General	Oppose	Modelling has been done in a thorough and transparent way with involvement of the Zone Committee and Hurunui Science Stakeholder Group. A considerable and sufficient degree of precaution has already been applied.
Forest & Bird	15.4	General	Oppose	Modelling has been done in a thorough and transparent way with involvement of the Zone Committee and Hurunui Science Stakeholder Group. A considerable and sufficient degree of precaution has already been applied.
Forest & Bird	15.5	General	Oppose	Modelling work done through the process of developing Proposed Plan Change 1, with the involvement of the Hurunui Science Stakeholder Group, and drawing upon the earlier LWRP Plan Change 5 process, established that Winter Grazing was the major activity which could potentially lead to increased nutrient discharge from dryland farms.
Forest & Bird	15.10	General	Oppose	Fish & Game's withdrawal from the collaborative process or the seeking of a declaration from the Environment Court, are not matters that need to be addressed in a s32 analysis.
Forest & Bird	15.11	General	Oppose	A considerable and sufficient degree of precaution has already been applied.
North Canterbury Fish & Game	23.24	General	Oppose	Fish & Game's withdrawal from the collaborative process or the seeking of a declaration from the Environment Court, are not matters that need to be addressed in a s32 analysis.
North Canterbury Fish & Game	23.25	General	Oppose	A considerable and sufficient degree of precaution has already been applied.
Planetary Foundation	Healing 20.1	General	Oppose	The Plan Change is needed to address issues arising from application of the definition <i>Change of land use</i> to dryland farms.
Planetary Foundation	Healing 20.2	General	Oppose	Responsible use of "chemical fertiliser" is necessary in order to maintain soil quality and sustain farm viability.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Planetary Healing Foundation	20.3	General	Oppose	This request for blanket setbacks is impractical, would adversely impact on farm viability and would not necessarily deliver environmental benefit. A much more targeted and effective approach to riparian management is needed.
North Canterbury Fish & Game	23.1	General	Oppose	Modelling has been done in a thorough and transparent way with involvement of the Zone Committee and Hurunui Science Stakeholder Group.
North Canterbury Fish & Game	23.3	General	Oppose	A considerable and sufficient degree of precaution has already been applied.
North Canterbury Fish & Game	23.6	General	Oppose	A considerable and sufficient degree of precaution has already been applied. A greater N offset is not indicated.
North Canterbury Fish & Game	23.8	General	Oppose	A considerable and sufficient degree of precaution has already been applied.
Forest & Bird	15.12	Policy 5.3C	Oppose	The wording as notified is more accurate.
North Canterbury Fish & Game	23.26	Policy 5.3C	Oppose	The wording as notified is more accurate.
Emu Plains Irrigation Incorporated	27.2	Rules - General	Oppose in part	Modelling has indicated that Plan Change 1 will have little or no impact on nutrient discharge from dryland farming.
Emu Plains Irrigation Incorporated	27.3	Rules - General	Oppose in part	Modelling has indicated that Plan Change 1 will have little or no impact on nutrient discharge from dryland farming (and therefore little or no impact on periphyton growth). Any attempt to specifically link an increase in periphyton growth with the implementation of Plan Change 1 would be fraught with difficulty given the myriad of factors which influence periphyton growth.
Forest & Bird	15.13	Rule 10.1	Oppose	A considerable and sufficient degree of precaution has already been applied.
Aotearoa New Zealand Fine Wine Estates	17.3	Rule 10.1	Support in part	Consistent with our request to permit small areas of irrigation, preferably along the lines of the Canterbury Land and Water Regional Plan (LWRP) Plan Change 5 Rules.
North Canterbury Fish & Game	23.27	Rule 10.1	Oppose	A considerable and sufficient degree of precaution has already been applied.
Forest & Bird	15.6	Rule 10.1A	Oppose	This amendment is not necessary. The rule clearly requires Management Plans to be supplied to the Canterbury Regional Council on request.
Forest & Bird	15.14	Rule 10.1A	Oppose	It is crucial that management Plans are "viewed only" in order to maintain confidentiality.
Aotearoa New Zealand Fine Wine Estates	17.4	Rule 10.1A	Support in part	Consistent with our request to permit small areas of irrigation, preferably along the lines of the LWRP Plan Change 5 Rules.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
North Canterbury Fish & Game	23.28	Rule 10.1A	Oppose	The first part of this requested amendment is not necessary. The rule clearly requires Management Plans to be supplied to the Canterbury Regional Council on request. Secondly, it is crucial that management Plans are "viewed only" in order to maintain confidentiality.
Aotearoa New Zealand Fine Wine Estates	17.5	Definitions – Change of land use	Support in part	Consistent with our request to permit small areas of irrigation, preferably along the lines of the LWRP Plan Change 5 Rules.
Aotearoa New Zealand Fine Wine Estates	17.6	Definitions – Dryland Farmer Collective agreement	Support in part	Consistent with our request to permit small areas of irrigation, preferably along the lines of the LWRP Plan Change 5 Rules.
Aotearoa New Zealand Fine Wine Estates	17.7	Definitions – Low Intensity Dryland Farming	Support in part	Consistent with our request to permit small areas of irrigation, preferably along the lines of the LWRP Plan Change 5 Rules.
Aotearoa New Zealand Fine Wine Estates	17.8	Definitions – Low Intensity Dryland Farming	Support in part	Consistent with our request to permit small areas of irrigation.
Emu Plains Irrigation Incorporated	27.5	Definitions – Low Intensity Dryland Farming	Oppose in part	Modelling has indicated that Plan Change 1 will have little or no impact on nutrient discharge from dryland farming (and therefore little or no impact on periphyton growth). Any attempt to specifically link an increase in periphyton growth with the implementation of Plan Change 1 would be fraught with difficulty given the myriad of factors which influence periphyton growth.

## Conclusion

Federated Farmers thanks Environment Canterbury for the opportunity to further-submit on Proposed Plan Change 1 to the Hurunui and Waiau River Regional Plan. We look forward to ongoing dialogue about the plan and continuing to work constructively with Council.

A handwritten signature in black ink, appearing to read 'Cameron Henderson', written in a cursive style.

Cameron Henderson  
President  
North Canterbury Province  
Federated Farmers of New Zealand