

From: [Charlotte Wright](#)
To: [Mailroom Mailbox](#)
Cc:
Subject: Plan Change 7 LWRP Further Submission
Date: Friday, 6 December 2019 2:36:45 PM

Good afternoon

Please find DairyNZ's further submission on Plan Change 7 [attached](#).

thanks

Charlotte Wright

Senior Policy Advisor

DairyNZ

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Work days/hours:

Monday, Tuesday, Wednesday

Thursday, Friday: 10-2

To: **Canterbury Regional Council**

Further Submission on: **Plan Change 7 to the Canterbury Land & Water Plan**

Date: **6th December 2019**

From: **DairyNZ**
Charlotte Wright
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1. INTRODUCTION

This is a Further Submission in relation to Plan Change 7 to the Canterbury Land & Water Regional Plan. DairyNZ is making this Further Submission as the industry good organisation representing New Zealand's dairy farmers. DairyNZ therefore has an interest in the proposed plan which is greater than the public generally.

DairyNZ's support and/or opposition to specific submissions is outlined in the attached table together with its reasoning and confirmation of the relief sought.

DairyNZ wishes to be heard in support of its Submission and Further Submission and is willing to consider presenting a joint case at hearing with other submitters addressing similar issues.

I can confirm that I am authorised to make this Further Submission on DairyNZ's behalf and, that copies will be served on the persons who made the original submissions to which it relates within 5 working days of today's date.



Charlotte Wright
Senior Policy Advisor
Dairy NZ

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
<i>Name & postal address of original submission</i>	<i>Submission point reference number (PN)</i>	<i>Provide reason for support or opposition</i>	<i>Allow or disallow</i>
Beef + Lamb New Zealand PO Box 39085 Christchurch 8545	(PN 214.9) Table 1a: Amend Table 1a to provide for primary contact recreation for those sites where primary contact recreation is an identified value and during the periods where this activity occurs.	It is appropriate to provide for primary contact recreation at the times of year & locations that contact recreation activities take place.	Allow
	(PN 214.52) Adopt the following Principles for the Allocation of Nutrients:	It is not clear how the principles can be implemented in a model that are both robust and easy to use, and no suggestions are made in the submission about this. Some of the principles are also already covered in the current and/or proposed planning framework.	Disallow
	(PN 214.68) 8.4.8 Amend the policy as follows: <i>Protect mahinga kai values for all lakes, rivers, wetlands and springs (waipuna) through else evaluation of any actions and timeframes described in the Farm Environment Plan when considering applications for resource consent for farming activities.</i>	The outcome of protecting mahinga kai is important but more clarity is needed in the method.	Allow
	(PN 214.70) Amend Policy 8.4.9 to require springs to be managed through a Farm Environment Plan rather than by stock exclusion.	Stock should be excluded from springs to protect headwaters & downstream water quality.	Disallow
	(PN 214.72) 8.4.16: Amend clause (b) and insert "stock drinking water"	Stock drinking water is a priority 1 take and is not always exclusively supplied through community water supplies. Furthermore, permitted rates or volumes on takes for stock water may be less than what is required for the number of stock, and so a water permit may be required to supplement the permitted take and provide sufficient volumes for reasonable stock drinking water use.	Allow

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	(PN 214.74) Delete Policy 8.4.25 in its entirety and replace with the framework proposed in submission point PC7-214.81.	Retain policy, subject to amendments sought to Table 8-9. The suggestion from B&L in submission point 214.81 is very complicated, and part of it may already be met by the existing policies. PN 214.81 is commented separately.	Disallow
	(PN 214.75) Delete Policy 8.4.26 in its entirety and replace with the framework proposed in submission point PC7-214.81.	DairyNZ have in previous submission suggested to amend the policy.	Disallow
	(PN 214.76) Delete Policy 8.4.27 in its entirety and replace with the framework proposed in submission point PC7-214.81.	DairyNZ have in previous submission suggested to amend the policy.	Disallow
	(PN 214.84) Amend Policy 8.4.28A to delete the term 'avoid' and replace it with a term that more appropriately reflects the intent of the plan change.	"Avoid" is a strong word and may have the effect of prohibiting activities.	Allow
	(PN 214.85) 8.4.28B: delete in its entirety	It is important to retain this alternative pathway for assessing and prescribing required N losses.	Disallow
	(PN 214.99) Amend Table 8b to provide for primary contact recreation for those sites where primary contact recreation is an identified value and during the period when this activity occurs.	It is appropriate to provide for primary contact recreation at the times of year & locations that contact recreation activities take place.	Allow
	(PN 214.101) Amend Table 8b so that trophic level indices, chlorophyll a, and cyanobacteria outcomes reflect water quality at the date of notification, or if degraded, reflect the instream outcomes required to provide for achievement of trophic state such as macroinvertebrate health, and/or periphyton outcomes, consistent with the requirements of	Agree that it is appropriate for the table to be consistent with the NPSFM.	Allow

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	the NPSFWM including consideration of economic and cultural impacts.		
	(PN 214.102) Amend Table 8-8 so that instream nitrogen concentrations reflect water quality at the date of notification, or if degraded, reflect the instream concentration required to provide for achievement of trophic state such as macroinvertebrate health, and/or periphyton outcomes, consistent with the requirements of the NPSFWM including consideration of economic and cultural impacts.	It is appropriate for the table to be consistent with the NPSFM.	Allow
	(PN 214.80) Delete Table 8.9 in its entirety and replace with the framework proposed in submission point PC7-214.81.	DairyNZ have proposed amendments to the table, see also comment on point 214.103. The framework proposed in point 214.81 is complex and no suggestion is made on how this will be implemented into a system that is both robust and simple to manage.	Disallow
	(PN 214.103) Delete Table 8-9 in its entirety.	DairyNZ have suggested retaining the 2030 reductions and deleting all subsequent reductions. To set a clear target for the near future will set the immediate direction for the work farmers need to do to decrease nitrogen losses.	Disallow
	(PN 214.104) Amend Rule 13.5.26 as follows: Within the Hinds/Kekeao Plains Area, any reference to the bed of a lake, river, or wetland in Rules 5.68, 5.69, 5.70, and 5.71 also includes any Main and Secondary Hinds Drain whether or not there is water in it, and any other drain that <u>permanently</u> has water in it. but does not include any sub-surface drain.	The amendment simplifies and make the rule easier to understand.	Allow

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	<p>(PN 214.81) Insert new provisions that achieve the following:</p> <ol style="list-style-type: none"> 1. Ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated; and 2. Ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability (LUC)), climate, geology, and assimilative capacity of water; and 3. Manage or allocate nitrogen based on: <ol style="list-style-type: none"> a. 'flat rate per hectare' permitted threshold (where the sub catchment load is divided by the total number of hectares in the sub catchment and this amount is allocated as a nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/yr; or b. Natural capital or land use capability based allocation per hectare' where a sub catchment nitrogen load is attributed to land based on its underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach is used to determine 	<p>The provisions suggested are complex and no suggestion is made on how they will be implemented into a system that is both robust and simple to manage.</p>	<p>Disallow</p>

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	<p>the permitted baseline, and where required to stage reductions in nitrogen discharges over time for example as set out in the table below; and</p> <p>c. Natural capital or land use capability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce nitrogen loss over time – based on calculating a sub catchment Nitrogen load and focusing on priority areas where nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in the table in Appendix 1 of the SODR.</p> <p>4. Ensure that low discharging land uses such as small scale (<20kg N/ha) or low impact activities (those discharging at or below the sustainable level) are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the sub catchment (FMU); and</p> <p>5. Require farming activities which exceed the 'sustainable level' for the sub-catchment (FMU) to progressively reduce contaminant discharges over time, where the</p>		

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	<p>reductions are proportionate to the level of over allocation within the sub-catchment and proportionate to the discharge level of the activity; and</p> <p>6. Enable establishment of nutrient user groups within the same catchment as part of catchment collective groups, and enable transfer of nutrients (at a level not exceeding the desired instream nutrient load), where the following principles are met:</p> <p>a. the initial allocation system meets all of the allocation principles listed in submission point PC7-214.152. For clarity this precludes nutrient transfer when allocation is based on current or historic discharges (NRP or Grandparenting, the allocation framework that PC7 currently proposes).</p> <p>b. transfer within nutrient user groups should only occur:</p> <p>i. within a sub-catchment or watershed; and</p> <p>ii. within an established sub catchment programme that's based on fair allocation of a load</p> <p>c. only pertains to the load which achieves the desired environmental outcome.</p> <p>d. results in improved economic outcomes and land use optimisation</p>		

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	7. Require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.		
	(PN 214.82) Insert new provisions that achieve the following:	This submission point appears to be the same as PN 214.81. See comment on point 214.81.	Disallow
North Canterbury Fish and Game Council PO Box 50 Woodend 7641	(PN 95.25) Amend policy 8.4.33 as follows: Enable catchment restoration activities that focus on the protection of springs, the protection, establishment or enhancement of planted riparian margins, the creation, restoration or enhancement of wetlands, indigenous biodiversity in riparian margins, <u>targeted</u> weed and pest control activities, and the targeted removal of fine sediment from waterbodies.	Support the amendment of the policy and the additional caution when using weed and pest control activities which could be potentially harmful if applied broadly and not targeted as suggested.	Allow
	(PN 95.27) Amend policy 8.4.35 as follows: Inform successive plan <u>annual</u> review cycles by reporting every <u>year</u> 5-years on:	It is not practical to have an annual review (reporting) cycle as suggested by the submitter. It will take time between the implementation of mitigation measures and the actual response in water quality. Little would be gained in reviewing every year since this would most likely only reflect annual fluctuations and not an actual trend. The 5-year cycle should be retained (but monitoring still needs to be done continuously).	Disallow
	(PN 95.57) Amend clause (d) of Policy 8.4.35 as follows: d. progress made towards freshwater outcomes and limits, including an assessment of the effectiveness of the	It is more appropriate to make these recommendations in connection to the actual plan change or when resource consents are reviewed. Recommendations based on annual reviews which might not	Disallow

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	framework, (including any non-statutory actions) in achieving those outcomes and limits, <u>and recommending any adaptive management interventions required where inadequate progress is being made due to severe climatic or land use change variables, that significantly threaten achievement of the targets, outcomes and limits set in the plan.</u>	reflect an actual change in current state, is not appropriate.	
	(PN 95.28) Amend Policy 8.4.36 as follows: Provide for the regular review and adjustments in progress towards achieving the freshwater outcomes and limits for the Waimakariri Sub-region, by applying the following common expiry dates to resource consents: a. 1 July 2037 <u>2032</u> ...; b. 1 July 2037 <u>2032</u> ...; c. 1 July 2037 <u>2032</u> ...; d. 1 July 2047 <u>2040</u>	Retain policy as it is, to allow for management changes to take effect, and results to be reflected in water quality outcomes.	Disallow
	(PN 95.29) Amend Policy 8.4.37 as follows: Apply the following durations to any resource consent granted after the relevant common expiry date in Policy 8.4.36 <u>and enable the inclusion of adaptive management conditions into these consents to allow for required interventions, in line with the monitoring review cycle in 8.4.35 for severe climatic or land use change variation, that significantly threatens</u>	DairyNZ agree that climate adaptation and response to climate change needs to be addressed. However, achieving this through enabling annual review of resource consents is not appropriate. The consents need to give stability and certainty for the farmers on how they will manage their farm. Short-term changes, via an annual cycle as proposed in policy 8.4.35, to the consent might undermine long-term business decisions and the work done to decrease the environmental impact from the farm. Even though DairyNZ supports stability in the conditions set, the possibilities for councils to review a consent already exists through the resource management act, section 128: Circumstances when consent conditions can be reviewed. It also gives the consent	Disallow

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	achievement of the outcomes and limits set in the plan.	<p>authority the possibility to include a purpose when to review the conditions of a resource consent. This ability would serve the same purpose as suggested in the amendment and doesn't need to be further regulated.</p> <p>Additionally, FEPs required as condition of consent do already provide a framework for review & adoption of improved technologies & practices to meet the objectives set out under these FEPs.</p>	
	<p>(PN 95.30) Amend Policy 8.4.38 to insert a new clause as follows:</p> <p><u>c. enable the inclusion of adaptive management conditions into these consents to allow any required interventions, in line with the monitoring review cycle in 8.4.35 for severe climatic or land use change variables that significantly threaten achievement of the outcomes and limits set in the plan.</u></p>	<p>Short-term changes in the conditions to farm, might undermine good management decisions and hinder mitigation measures rather than enforcing them.</p> <p>Additionally, FEPs required as condition of consent do already provide a framework for review & adoption of improved technologies & practices to meet the objectives set out under these FEPs.</p>	Disallow
	Amend Table 8-5 to provide a 30% precautionary reduction in the notified N mg/l limits.	A precautionary approach is already built into the targets proposed.	Disallow
	Amend Table 8-5 to amend the N limits to be consistent with the recommended COMAR levels.	It is unclear which COMAR levels are being referred to.	Disallow
	Amend Table 8-5 to implement step-change nitrate-nitrogen target and limit reductions for the majority of the rivers and drains in the Northern Waimakariri Tributaries FMU.	Any changes to limits & targets need to be based on evidence of causal links between land use & water quality & a robust evaluation of costs & benefits.	Disallow
	Amend Table 8-5 to amend the 2080 implementation date to be less conservative, taking into account	An adaptive management approach is preferred, to allow future management actions to be based on state & trends in water quality, whilst avoiding severe & immediate effect on property	Disallow

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	the relative carrying capacity of the zone to absorb current and projected nutrient discharges and recover to an overall healthy level.	values, farm businesses and farmer wellbeing.	
	Amend Table 8-5 to amend the phosphorus limits for waterbodies with limits above 0.01 mg/l DRP to 0.01 mg/l DRP, or at least set a target for waterbodies to reach this target.	Current target is appropriate.	Disallow
	(PN 95.48) Amend Table 8-9 to include selected six-year rolling average in-river loads as indicators for achieving the scheduled nitrogen reductions, as well as for showing improvements in phosphorus reduction initiatives in the catchment.	DairyNZ agree that water quality data needs to be publicly available and communicated to landowners and other stakeholders. However, amending the table is not an appropriate mechanism for achieving this.	Disallow
	(PN 95.102) Amend Table 8-9 to change the reduction achievement dates as follows: <ul style="list-style-type: none"> - Dairy sub-areas A to E 15% reduction by 2030 <u>2027</u>; - Dairy sub-areas A to E 30% reduction by 2040 <u>2032</u>; - All other sub-areas A to E 5% reduction by 2030 <u>2027</u>; - All other sub-areas A to E 10% reduction by 2040 <u>2032</u>; and - For all improvements for 2050 and beyond, bring forward the dates by ten years respectively. 	DairyNZ opposes setting a N reduction target for 2040 (and beyond) based on likely severe economic impacts on the profitability and viability of these farms.	Disallow
Central South Island Fish and	(PN 351.23) Amend condition 2 of	The suggested amendment makes the rule clearer.	Allow

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<p>Game Council 32 Richard Pearse Drive PO Box 150 Temuka 7948</p>	<p>Rule 5.191 as follows:...</p> <p>2. Unless the proposed take is the replacement of a lawfully established take for managed aquifer recharge affected by the provisions of section 124 -124C of the RMA, the take, in addition to all existing consented takes, does not result in an any further exceedance of any environmental flow or an allocation limit, or rate of take, or seasonal or annual volume limit set in Sections 6 to 15 of this Plan for that surface water body, <u>or an environmental flow not being met</u>; and</p>		
	<p>(PN 351.24) Amend rule 5.192 as follows: The take of surface water for managed aquifer recharge, the associated use and discharge of that water and entrained contaminants into water or into or onto land, the use of land for the excavation and deposition of material to construct the managed aquifer recharge system, and the discharge of construction-phase stormwater into or onto land where it may enter water, that does not meet one or more of the conditions of Rule 5.191, excluding condition 1 <u>or 2</u>, is a non-complying activity.</p>	<p>MAR has the potential to provide a multi-pronged solution to water quality issues in the zone. Retaining this policy allows for a 'net benefit' approach to be carefully considered. DairyNZ suggests that pre-hearing caucusing may be of benefit in agreeing on acceptable approach for this policy</p>	<p>Disallow</p>
	<p>(PN 351.25) Amend rule 5.193 as follows: The take of surface water for managed aquifer recharge, the associated use and discharge of that water and entrained</p>	<p>MAR has the potential to provide a multi-pronged solution to water quality issues in the zone. Retaining this policy allows for a 'net benefit' approach to be carefully considered. DairyNZ suggests that pre-hearing caucusing may be of benefit in agreeing on</p>	<p>Disallow</p>

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	contaminants into water or into or onto land, the use of land for the excavation and deposition of material to construct the managed aquifer recharge system, and the discharge of construction-phase stormwater into or onto land where it may enter water, that does not meet condition 1 or 2 of Rule 5.191 is a prohibited activity.	acceptable approach for this policy	
Royal Forest & Bird Protection Society Inc. PO Box 2516 Christchurch 8140	(PN 472.94) Amend Policy 8.4.32 to phase out cattle winter grazing in areas with high ecological value during the life of this Plan.	Winter grazing is already further restricted in policy 8.4.25 (a). Including a restriction for areas with high ecological value would make the protection clearer.	Allow
	(PN 472.95) Amend Policy 8.4.33 to phase out cattle winter grazing in areas with high ecological value during the life of this Plan.	Winter grazing is already further restricted in policy 8.4.25 (a). Including a restriction for areas with high ecological value would make the protection clearer.	Allow
	(PN 472.96) Amend Policy 8.4.34 to phase out cattle winter grazing in areas with high ecological value during the life of this Plan.	Winter grazing is already further restricted in policy 8.4.25 (a). Including a restriction for areas with high ecological value would make the protection clearer.	Allow
	(PN 472.210) Amend Schedule 7 to insert the requirement for contour based drainage plans.	It is unclear what benefit this would provide.	Disallow
	(PN 472.211) Amend Schedule 7 to insert the requirement for mapping of mahinga kai sites, wahi tapu and wahi taonga.	Schedule 7a already requires mapping to be carried out. The requirement to map sites of cultural value could be strengthened. However, the location of wahi tapu and wahi taonga sites may not be known by landowners for sensitivity reasons. Therefore we do not support requirement to map these latter sites.	Allow in part
	(PN 472.212) Amend Schedule 7 to insert the requirement for the mapping of wetlands.	Provide 'wetlands' are clearly defined, we support this requirement.	Allow

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	(PN 472.213) Amend Schedule 7 to insert the requirement to identify any areas of indigenous biodiversity including flora, fauna and ecological communities that are not listed as significant but are likely to meet the CRPS significance criteria.	Landowners under already required to map areas of significant indigenous biodiversity. Clarity would need to be provided on the criteria for inclusion of further flora & fauna values.	Allow in part
	(PN 472.214) Amend Schedule 7 to insert the requirement to identify whether the farm is located within an outstanding landscape or has outstanding natural features including but not limited to ecological, archaeological, or geological features.	Provide qualifying criteria are clearly defined, we support this requirement.	Allow
	(PN 472.215) Amend Schedule 7 to insert measurable objectives that can be enforced under consent conditions.	It is unclear what objectives are being referred to. The FEP audit process already requires compliance with actions to achieve objectives.	Disallow
Synlait Milk Limited 1028 Heslerton Road Rakaia C/- Duncan Cotterill 148 Victoria Street, Christchurch	(PN 188.5) Insert a new policy in Section 8 as follows: Policy 8.4.XX Increase knowledge and understanding of water quality results through increased monitoring of nitrate nitrogen levels in groundwater, by requiring consent holders to undertake in the month of August a groundwater sample.	This suggestion would help to build a picture of groundwater trends.	Allow
	(PN 188.6) Insert a new rule in Section 8 as follows: Where an application for a farming	This suggestion would help to build a picture of groundwater trends.	Allow

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	<p>activity is made in relation to a property with at least one existing bore, a sample is to be taken from a specified bore on the property for which consent is held; or in the case of a scheme requiring a sample from each property supplied. The sample shall be analysed by a laboratory that is certified for that method of analysis for nitrate-nitrogen and the results of this analysis shall be provided to the Canterbury Regional Council, Attention RMA Compliance and Enforcement Manager, within one month of the sample collection.</p> <p>Alternatively, include this as a requirement of a permitted/controlled/restricted discretionary application when seeking a resource consent for farming activities, and if an applicant refuses to comply with the requirement, the application should be processed as a non-complying activity.</p>		
<p>Canterbury District Health Board Community and Public Health C/- Canterbury District Health Board PO Box 1475 Christchurch 8140</p>	<p>(PN 347.11) Amend 'Note 2' of Table 8-7 to clarify how a representative area is defined.</p>	<p>A definition would make it clearer.</p>	<p>Allow</p>
<p>Christchurch City Council Strategy and Transformation</p>	<p>(PN 337.147) Amend objectives, policies and rules in PC7 to account for projected climate change effects, including lower river levels, higher</p>	<p>To explicitly include the adaptation to climate change in current plan change would require a different approach and assessment of consequences. It would probably delay the process with the</p>	<p>Disallow</p>

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Christchurch City Council PO Box 73012 Christchurch 8154	sea levels and increased groundwater levels.	plan change.	
	(PN 337.146) Require that the s32 report includes the costs of removing nitrate from the water supply needs to be assessed, and an assessment needs to be provided on an alternative scenario in which nitrate nitrogen levels are kept considerably lower.	In general, to assess the cost of removing nitrogen from the water supply is supported. However, a balance needs to be kept between risk and cost, and the impact considerably lower levels might have on the whole society (possibilities to live, work etc. in rural communities) should be included.	Allow in part
	(PN 337.179) Require Council to undertake a proper alternatives evaluation in its Section 32 for Table 8-9, given the economic, social, recreational, and environmental value of the Christchurch aquifers as a drinking water supply for Christchurch and its contribution to maintaining ecological values in spring-fed rivers.	This evaluation needs to be considered alongside the social and economic value of agricultural production and its contribution to society and possibilities to work and live in rural communities. The proposed actions in Plan Change 7 are expected to provide for the values listed through improved land management practices.	Allow in part
	(PN 337.7) Amend Table 1a to set the target QMCI for hill-fed lower waterways and spring-fed plains waterways to 5 (good-doubtful quality or possible mild pollution).	Unclear reasons for making this change.	Disallow
	(PN 337.139) Require low concentrations of nitrate nitrogen in the deep aquifer bores supplying Christchurch and in shallow groundwater that feeds spring fed streams.	We agree with the need to have good drinking water quality, but mitigation options need to be undertaken long-term and the balance between risk- and cost needs to be evaluated.	Allow in part
	(PN 337.143) Amend Section 8 policies and rules under nutrient	The tables are already referred to in an adequate way.	Disallow

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	management to adequately connect to the Tables in section 8.		
	(PN 337.148) Require PC7 to account for inter zone nitrate issues in the Christchurch-West Melton Sub-regional chapter.	Inter zone issues are already partially addressed under PC7 Objectives. Limits for the Chch West-Melton zone will be appropriately addressed under a Chch-West Melton Plan Change	Disallow
	(PN 337.140) Require the maintenance of a supply of high quality groundwater for drinking water supplies without treatment for nitrates and that a nitrate threshold of less than 1mg/L is the Council's preferred option.	Support the need for high quality drinking water without need for treatment. However, the appropriate threshold needs to be based on a rigorous evidence-based assessment of risk, costs and benefits.	Allow in part
	(PN 337.142) Require that the reduction targets are increased (such as those provided in Table 8-9) and are brought forward such that nitrate nitrogen concentrations predicted to enter the Christchurch aquifer system are abated over shorter timeframes and nutrient loads are attenuated more quickly.	The current reduction target of 15% by 2030 will be challenging for many farmers, depending on their baseline GMP loss rate and their level of debt. Increased reduction targets with a short time frame will have severe consequences for the possibilities to farm within the area.	Disallow
	(PN 337.113) Amend the Nitrate Priority Area map so that it covers the full extent of the area that is the groundwater source for Christchurch aquifers.	NPA already covers nitrate source area.	Disallow
	(PN 337.191) Insert a new nitrate policy area (buffer area) located on the north bank of the Waimakariri River.	NPA already covers the North Bank of the Waimakariri.	Disallow
	(PN 337.95) Amend Policy 8.4.25 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring	Monitoring is an important part of the review cycle. Specifications will help to make it more uniform and increase comparability between different sites, but this should be covered in a different	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	part of the plan e.g. 8.4.35 (Plan monitoring and review).	
	(PN 337.157) Amend Policy 8.4.25 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	The policy is already sufficiently clear.	Disallow
	(PN 337.158) Amend Policy 8.4.25 to provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of Policy 8.4.28A) including a requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.	Policy 8.4.25 and Policy 8.4.28A are based on different premises. Policy 8.4.28A seeks to avoid discharges to surface water in the first instance whereas 8.4.25 implements a stage approach to reduction of diffuse contaminants (by refereeing to table 8-9), recognising that it is not appropriate to require avoidance of these diffuse discharges.	Disallow
	(PN 337.96) Amend Policy 8.4.26 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Monitoring is an important part of the review cycle. Specifications will help to make it more uniform and increase comparability between different sites, but this should be covered in a different part of the plan e.g. 8.4.35 (Plan monitoring and review).	Disallow
	(PN 337.159) Amend Policy 8.4.26 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	The policy is already sufficiently clear.	Disallow
	(PN 337.160) Amend Policy 8.4.26 to provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of Policy 8.4.28A) including a	The policy already requires that applicants show how the reductions will be achieved. It also refers to table 8-9 so no further reference to the water quality limits and targets are necessary.	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.		
	(PN 337.93) Amend Policy 8.4.27 to provide more restricted circumstances and clearer direction on where and why consent will be granted where the nitrogen loss reductions in Table 8-9 cannot be met within the nitrate Policy Area.	The policy is already sufficiently clear.	Disallow
	(PN 337.97) Amend Policy 8.4.27 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Monitoring is an important part of the review cycle. Specifications will help to make it more uniform and increase comparability between different sites, but this should be covered in a different part of the plan e.g. 8.4.35 (Plan monitoring and review).	Disallow
	(PN 337.161) Amend Policy 8.4.27 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	The policy is already sufficiently clear.	Disallow
	(PN 337.162) Amend Policy 8.4.27 to provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of Policy 8.4.28A) including a requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.	The policy already requires that applicants show how the reductions will be achieved.	Disallow
	(PN 337.94) Amend clause (e) of Policy 8.4.27 as follows:	It is critical that this policy be retained so that landowners can gain recognition of previous efforts and demonstrate a case for continued genuine efforts to work towards nitrogen loss	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	e. progress made towards achieving nitrate-nitrogen limits and targets in Tables 8-5, 8-6, 8-7 and 8-8.	reductions, within a timeframe that maintains financial viability. This also allows for a more equitable application of nitrogen reduction policies in instances where economic impacts disproportionately affect individual landowners.	
	(PN 337.192) Insert a new policy to cover the full extent of the Nitrate Priority Area.	NPA already sufficiently delineated.	Disallow
	(PN 337.193) Insert new rules to cover the full extent of the Nitrate Priority Area.	NPA already sufficiently delineated.	Disallow
	(PN 337.98) Amend Table 8-5 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Specifications of monitoring will help to make it more uniform and increase comparability between different sites. However, it would be more appropriate to include a new rule with these specifications, that would apply to all sampling and analysis, rather than repeating this for every table concerned.	Allow in part
	(PN 337.104) Amend Table 8-5 to include a limit for the Waimakariri River at both the Gorge and SH1 Bridge of Nitrate 0.1 ppm.	Limits need to reflect our current understanding of effects on human health, which is achieved through being consistent with the NPS-FM.	Disallow
	(PN 337.163) Amend Table 8-5 to reduce the limits for the northern Waimakariri tributaries in line with up to date research on effects of nitrate nitrogen on human health and aquatic ecosystems.	Limits need to reflect our current understanding of effects on human health, which is achieved through being consistent with the NPS-FM. DairyNZ support a further investigation into the links between health risk and nitrogen levels. It is probably not feasible to think that such an investigation could be done quickly to allow for any changes to the plan to be made based on the outcome of the investigation.	Disallow
	(PN 337.180) Amend Table 8-5 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent	Application of limits and targets to resource consents is dealt with elsewhere.	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	application on an individual basis.		
	(PN 337.99) Amend Table 8-6 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Specifications of monitoring will help to make it more uniform and increase comparability between different sites. However, it would be more appropriate to include a new rule with these specifications, that would apply to all sampling and analysis, rather than repeating this for every table concerned.	Allow in part
	(PN 337.182) Amend Table 8-6 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	Application of limits & targets to resource consents is dealt with elsewhere.	Disallow
	(PN 337.183) Amend Table 8-6 to provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of 8.4.28A) including a requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.	The table sets limits & targets. Application of limits and targets to resource consents and link to outcomes is dealt with elsewhere.	Disallow
	(PN 337.100) Amend Table 8-7 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Specifications of monitoring will help to make it more uniform and increase comparability between different sites. However, it would be more appropriate to include a new rule with these specifications, that would apply to all sampling and analysis, rather than repeating this for every table concerned.	Allow in part
	(PN 337.105) Amend Table 8-7 to include the Council deep aquifer bores with a limit of 1 mg/L Nitrate-	It is our understanding that limits for Chch aquifers will be dealt with under the Chch-West-Melton Plan Change. Additionally, 1 mg/L is significantly lower than the NZ Guidelines of 1/2 Maximum	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	Nitrogen.	Allowable Value for drinking water that has been proposed in the plan.	
	(PN 337.144) Amend Table 8-7 to require additional protection for the Waimakariri River through adding a nitrate-nitrogen water quality target for the Waimakariri River of 0.1mg/L (annual median) to Table 8-7 and that this forms the basis of a new nitrate priority area *buffer area) to be added to the planning maps.	Limits need to reflect our current understanding of effects on human health, which is achieved through being consistent with the NPS-FM. This is a very low target that would require a lot to achieve. It is probably not reasonable.	Disallow
	(PN 337.164) Amend Table 8-7 to insert a new note as follows (consequential to PC7-337.105): <u>3. The limit for Christchurch City Council Deep Aquifer bores is the median value for all samples collected from all actively used bores or as determined by Christchurch City Council.</u>	It is our understanding that limits for Chch aquifers will be dealt with under the Chch-West-Melton Plan Change. Additionally, 1 mg/L is significantly lower than the NZ Guidelines of 1/2 Maximum Allowable Value for drinking water that has been proposed in the plan.	Disallow
	(PN 337.165) Amend Table 8-7 to reduce the limit for individual Waimakariri District Council community supply wells from 5.65 mg/L (maximum) to less than 1 mg/L for consistency with Christchurch and account for recent research on effects of nitrate nitrogen on human health and ecosystems.	DairyNZ support a further investigation into the links between health risk and nitrogen levels. It is probably not feasible to think that such an investigation could be done quickly to allow for any changes to the plan to be made based on the outcome of the investigation. It is unclear what the proposed level is based on or what the consequences will be of this amendment. We propose that the lower nitrogen concentration is evaluated before any changes is considered.	Disallow in part
	(PN 337.166) Amend Table 8-7 to reduce the limit for private water supply wells from 5.65 mg/L (median) to less than 1 mg/L for consistency with Christchurch and account for recent research on	DairyNZ support a further investigation into the links between health risk and nitrogen levels. It is probably not feasible to think that such an investigation could be done quickly to allow for any changes to the plan to be made based on the outcome of the investigation. It is unclear what the proposed level is based on or what the	Disallow in part

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	effects of nitrate nitrogen on human health and ecosystems.	consequences will be of this amendment. We propose that the lower nitrogen concentration is evaluated before any changes is considered.	
	(PN 337.178) Require Council to investigate further the links between increased health risks from nitrate nitrogen levels in groundwater, including colorectal cancer and revise the limits and targets in Table 8-7 accordingly.	DairyNZ support a further investigation into the links between health risk (cancer) and nitrogen levels. It is probably not feasible to think that such an investigation could be done quickly to allow for any changes to the plan to be made based on the outcome of the investigation.	Allow in part
	(PN 337.184) Amend Table 8-7 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	Application of limits & targets to resource consents is dealt with elsewhere.	Disallow
	(PN 337.185) Amend Table 8-7 to provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of 8.4.28A) including a requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.	The table sets limits & targets. Application of limits and targets to resource consents and link to outcomes is dealt with elsewhere.	Disallow
	(PN 337.101) Amend Table 8-8 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Specifications of monitoring will help to make it more uniform and increase comparability between different sites. However, it would be more appropriate to include a new rule with these specifications, that would apply to all sampling and analysis, rather than repeating this for every table concerned.	Allow in part
	(PN 337.106) Amend Table 8-8 to add a groundwater allocation zone for deep groundwater in Christchurch with a nitrate threshold	It is our understanding that limits for Chch groundwater zones will be dealt with under the Chch-West-Melton Plan Change. Additionally, 1 mg/L is significantly lower than the NZ Guidelines of 1/2 Maximum Allowable Value for drinking water that has been	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	of less than 1ppm.	proposed in the plan.	
	(PN 337.167) Amend Table 8-8 to reduce the limits for the Northern Waimakariri Tributaries in line with up to date research on effects of nitrate nitrogen on human health and ecosystems.	DairyNZ support a further investigation into the links between health risk and nitrogen levels. It is probably not feasible to think that such an investigation could be done quickly to allow for any changes to the plan to be made based on the outcome of the investigation.	Disallow
	(PN 337.186) Amend Table 8-8 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	Application of limits & targets to resource consents is dealt with elsewhere.	Disallow
	(PN 337.187) Amend Table 8-8 to provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of 8.4.28A) including a requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.	The table sets limits & targets. Application of limits and targets to resource consents and link to outcomes is dealt with elsewhere.	Disallow
	(PN 337.102) Amend Table 8-9 to specify the method(s) by which nitrate levels will be monitored and the frequency with which monitoring will be undertaken in order to determine progress towards meeting limits/targets in Tables 8-5 to 8-8.	Specifications of monitoring will help to make it more uniform and increase comparability between different sites. However, it would be more appropriate to include a new rule with these specifications, that would apply to all sampling and analysis, rather than repeating this for every table concerned.	Allow in part
	(PN 337.107) Amend Table 8-9 to include tighter timeframes for achieving the required nitrogen loss reductions: Sub Area A	DairyNZ opposes setting a nitrogen reduction target for 2040 (and beyond) based on likely severe economic impacts on the profitability and viability of these farms. The current reduction target of 15% by 2030 will already be	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	Dairy by January 2030: 45% <u>40%</u> Dairy by January 2040: 30% <u>60%</u> Dairy by January 2050: <u>80%</u> All other by January 2030: 5% <u>20%</u> All other by January 2040: 40% <u>30%</u> All other by January 2050: <u>40%</u>	challenging for many farmers, depending on their baseline GMP loss rate and their level of debt.	
	(PN 337.168) Amend Table 8-9 to meet lower nitrate water quality limits and thresholds, shorten the timeframes and amalgamate zones as appropriate: Sub Area A Dairy by January 2030: 45% <u>40%</u> Dairy by January 2040: 30% <u>60%</u> Dairy by January 2050: <u>80%</u> All other by January 2030: 5% <u>20%</u> All other by January 2040: 40% <u>30%</u> All other by January 2050: <u>40%</u>	DairyNZ opposes setting a nitrogen reduction target for 2040 (and beyond) based on likely severe economic impacts on the profitability and viability of these farms. The current reduction target of 15% by 2030 will already be challenging for many farmers, depending on their baseline GMP loss rate and their level of debt.	Disallow
	(PN 337.169) Amend Table 8-9 to amalgamate the five sub-areas into one nitrate priority area.	Support on the provision that the 'Area A; reductions are adopted across the board (as opposed to 'Area E').	Allow
	(PN 337.188) Amend Table 8-9 to specify/clarify how the targets in Table 8-5, 8-6, 8-7 and 8.8 will apply to a resource consent application on an individual basis.	The requirements in this point number do not appear to be included in the original submission from Christchurch city council. Additionally, application of limits & targets to resource consents is dealt with elsewhere.	Disallow
	(PN 337.189) Amend Table 8-9 to	The requirements in this point number do not appear to be	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	provide greater policy support for the targets identified in Tables 8-5, 8-6, 8-7, and 8-8, (similar to the last part of 8.4.28A) including a requirement to minimise the loss or discharge of contaminants to achieve the outcomes sought in the tables.	included in the original submission from Christchurch city council. The table sets limits & targets. Application of limits and targets to resource consents and link to outcomes is dealt with elsewhere.	
	(PN 337.190) Amend Table 8-9 to include a nitrate nitrogen water quality target of 0.1mg/L (annual median).	The requirements in this point number do not appear to be included in the original submission from Christchurch city council. Additionally, the proposed target is unachievable.	Disallow
Submission points relating to the Orari-Temuka-Opihi-Pareora sub-region			
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu Aoraki Environmental Consultancy Ltd	(PN 424.195) Opposes MAR in the OTOP Zone, amend provisions to discourage the activity and require the weight of the mauri of waterbodies to be strongly weighted against benefits land users may get from mixing waters.	DairyNZ recognises the importance of the Mauri of the water bodies and that this should be weighed against the benefits of MAR. However, enabling MAR as an alternative to other mitigations allows community outcomes to be achieved more efficiently, providing MAR achieves equivalent or better community outcomes.	Disallow in part
	(PN 424.4) Delete policy 14.4.2 and replace with: <u>Any use of land for a farming activity, or to take and use water, or to discharge contaminants shall require a resource consent and shall demonstrate that adverse effects on culturally significant sites are avoided.</u>	Keep policy as it is.	Disallow
Royal Forest & Bird Protection Society Inc. PO Box 2516 Christchurch 8140	(PN 472.162) Amend clause (a) of Policy 14.4.17 as follows: a. all permitted farming activities on properties greater than 40 <u>0.5</u> hectares to prepare and implement a Management Plan in accordance	It is uncertain what will be gained in water quality improvements by adding this.	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	with Schedule 7A; and...		
	(PN 472.171) Delete clause (c) of Policy 14.4.20A.	It is important to recognise the cost for mitigation measures and the time it takes to implement and give effect to them. The sum of the provisions will make sure progress are made to meet reductions and limits and targets.	Disallow
	(PN 472.164) Amend the required reductions in Table 14(zc) so that they go further and faster to reflect the needs of the water and a genuine intent to address the water crisis.	DairyNZ supports the inclusion of reductions for 2030 but does not consider that adequate assessment has been undertaken to support the inclusion of the 2035 reductions or a shorter time frame.	Disallow
Beef + Lamb New Zealand PO Box 39085 Christchurch 8545	(PN 214.116) Amend Policy 14.4.15 to recognise that livestock exclusion from springs on non-intensive farms may not be needed to achieve good water quality, and that risk assessment and management practices through Management Plans may be more appropriate.	Stock should be excluded from springs to protect headwaters & downstream water quality.	Disallow
	(PN 214.117) Amend Policy 14.4.16 to recognise that livestock exclusion from springs on non-intensive farms may not be needed to achieve good water quality, and that risk assessment and management practices through Management Plans may be more appropriate.	Stock should be excluded from springs to protect headwaters & downstream water quality.	Disallow
	(PN 214.119) Amend Policy 14.4.17 to recognise that livestock exclusion from springs on non-intensive farms may not be needed to achieve good water quality, and that risk assessment and management practices through Management Plans may be more appropriate.	Springs are regulated elsewhere in the plan.	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	(PN 214.120) Amend Policy 14.4.17 to ensure that access to appropriate cultural advisors can be provided to land users who request to use their assistance in protecting culturally significant sites, at Environment Canterbury's expense.	This is regulated elsewhere in the plan.	Disallow
	(PN 214.122) Insert new provisions that achieve the following: 1. Ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated; and 2. Ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability(LUC)), climate, geology, and assimilative capacity of water; and 3. Manage or allocate nitrogen based on: a. 'flat rate per hectare' permitted threshold (where the sub catchment load is divided by the total number of hectares in the sub catchment and this amount is allocated as a nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/yr; or b. Natural capital or land use capability based allocation per hectare' where a sub catchment nitrogen load is attributed to land	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	<p>based on its underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach is used to determine the permitted baseline, and where required to stage reductions in nitrogen discharges over time for example as set out in the table below; and</p> <p>c. Natural capital or land use capability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce nitrogen loss over time – based on calculating a sub catchment Nitrogen load and focusing on priority areas where nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in the table below.</p> <p>d. INSERT TABLE [See Appendix 3 of the SODR]</p> <p>4. Ensure that low discharging land uses such as small scale (<20kg N/ha) or low impact activities (those discharging at or below the sustainable level) are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the</p>		

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	<p>subcatchment (FMU); and</p> <p>5. Require farming activities which exceed the 'sustainable level' for the sub-catchment (FMU) to progressively reduce contaminant discharges over time, where the reductions are proportionate to the level of overallcoation within the sub-catchment and proportionate to the discharge level of the activity; and</p> <p>6. Enable establishment of nutrient user groups within the same catchment as part of catchment collective groups, and enable transfer of nutrients (at a level not exceeding the desired instream nutrient load), where the following principles are met:</p> <p>a. the initial allocation system meets all of the allocation principles in Appendix 1 (annexed to these submissions), for clarity this precludes nutrient transfer when allocation is based on current or historic discharges (NRP or Grandparenting, the allocation framework that PC 7 currently proposes).</p> <p>b. transfer within nutrient user groups should only occur:</p> <p>i. within a sub-catchment or watershed; and</p> <p>ii. within an established sub catchment programme that's based</p>		

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	<p>on fair allocation of a load</p> <p>c. only pertains to the load which achieves the desired environmental outcome.</p> <p>d. results in improved economic outcomes and land use optimisation</p> <p>7. Require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p>		
	(PN 214.123) Delete Policy 14.4.18 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.124) Delete Policy 14.4.19 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.125) Delete Policy 14.4.20 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.126) Delete Policy 14.4.20A in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules. Amend policy as suggested in DairyNZ previous submission.	Disallow in part
	(PN 214.136) Delete Policy 14.4.20C in its entirety and replace	DairyNZ supports that the policy is deleted in its entirety but doesn't consider that it should be replaced with suggested	Disallow in part

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	with the framework sought in submission point PC7-214.122.	provisions in point 214.122. The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	
	(PN 214.137) Amend Policy 14.4.22 to be consistent the framework sought in submission point PC7-214.122, but retain the proposed wording to protect security of supply for stock drinking water.	Retain policy as it is.	Disallow in part
	(PN 214.127) Delete Policy 14.4.28 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.128) Delete Policy 14.4.41 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.129) Delete Rule 14.5.19 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.149) Amend Rule 14.5.19 in accordance with submission point PC7-214.122.	Retain rule and include amendments suggested by DairyNZ in its previous submission.	Disallow in part
	(PN 214.130) Delete Rule 14.5.20 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.131) Delete Rule 14.5.21 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.132) Delete Rule 14.5.22 in its entirety and replace with the	The provisions suggested are complex and no suggestion is made	Disallow

(1) I support or oppose the submission of:	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are:	(3) I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
	framework sought in submission point PC7-214.122.	on how they will be translated into policies and rules.	
	(PN 214.133) Delete Rule 14.5.23 in its entirety and replace with the framework sought in submission point PC7-214.122.	The provisions suggested are complex and no suggestion is made on how they will be translated into policies and rules.	Disallow
	(PN 214.135) Delete Policy 14.4.20B in its entirety.	DairyNZ supports the provision of an alternate methodology where the Farm Portal is unable to generate a Baseline GMP Loss Rate or Good Management Practice Loss Rate.	Disallow
	(PN 214.134) Delete Table 14(zc) in its entirety and replace with the framework sought in submission point PC7-214.122.	The suggested provisions in point 214.122 are complex and no suggestion is made on how they will be implemented in a robust and manageable system.	Disallow

ENDS

From: [Carina Ross](#)
To: [Tavisha Fernando](#)
Cc: [Charlotte Wright](#)
Subject: RE: Further Submission Plan Change 7 to the Land and Water Regional Plan
Date: Tuesday, 17 December 2019 3:10:31 PM

Hi Tavisha,

I am sorry for this error, here are the submission point numbers that were missing from our further submission.

95.47
95.98
95.99
95.100
95.101

Please let me know if you have any further questions on our submission.

Kind Regards,

Carina Ross

Carina Ross
Regional Policy Advisor

DairyNZ

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From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Sent: Tuesday, 17 December 2019 2:41 pm
To: Charlotte Wright <Charlotte.Wright@dairynz.co.nz>
Subject: Further Submission Plan Change 7 to the Land and Water Regional Plan

Tena koe Charlotte

We are currently processing further submissions on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan.

In order for us to ensure that your further submission points are assigned to the correct submission points, please can you clarify the submission numbers which should be referenced on pages 11 and 12 of your further submission which mention table 8-5.

Nga mihi

Tavisha

Tavisha Fernando
Planning Officer Hearings
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**FURTHER SUBMISSION ON ADDITIONAL SUBMISSION POINTS IN THE ADDENDUM
TO THE SUMMARY OF DECISIONS**

PLAN CHANGE 7 TO THE CANTERBURY LAND & WATER REGIONAL PLAN

Clause 8 of Schedule 1, Resource Management Act 1991

To Canterbury Regional Council

mailroom@ecan.govt.nz (subject: "Plan Change 7 LWRP Further Submission - Addendum")

c/- Customer Services
Environment Canterbury
P O Box 345
Christchurch 8140

Name of person making further submission: ***Dairy Holdings Limited (DHL)***

- 1 DHL has an interest in the proposal that is greater than the interest of the public generally (in that it owns farming properties that will directly affected by the changes).
- 2 If others make a similar submission, DHL will consider presenting a joint case with them at a hearing.
- 3 DHL's further submission are set out in **Annexure 1**.

Signed for and on behalf of Dairy Holdings Limited by its solicitors and authorised agents
Chapman Tripp



Ben Williams
Partner
18 December 2019

Address for service of submitter:

Dairy Holdings Limited
c/- Ben Williams / Rachel Robilliard
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Annexure 1 – DHL Further submission – Summary of Decisions Requested Report Addendum

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
14.06.04 Table 14(zc) PC7-357.67	DairyNZ Limited	Support	<p>DHL supports in principle the proposal to delete Table 14(zc) and replace it with the new table set out in the submission (noting DHL's submissions elsewhere that the boundary of the Rangitata-Orton High Nitrogen Concentration Area is amended to follow the existing green zone near the Rangitata River).</p> <p>DHL agrees that there has not been adequate assessment to support the inclusion reductions to 2035, and agrees that reductions should only be required to be achieved if the water quality targets are not being met.</p>	Accept the submission