

From: [Georgina Hamilton](#)
To: [Mailroom Mailbox](#)
Cc: [Julia Crossman](#); ["adelecoombs@y7mail.com"](#); [Georgina Hamilton](#); ["drewsallybrown@gmail.com"](#); ["sandsfraser@xtra.co.nz"](#); ["claxby@xtra.co.nz"](#); ["dandmpatchett@xtra.co.nz"](#); ["steve@futererivers.co.nz"](#); ["steve.gerard@xtra.co.nz"](#); ["the-burkes@outlook.com"](#); ["n.snoyink@forestandbird.org.nz"](#); ["kyliehall@aectd.co.nz"](#); ["office@wilfarm.co.nz"](#); ["mark.rocklands@gmail.com"](#); ["richard@greenvale.co.nz"](#); ["jarowfarming@gmail.com"](#); ["biggsag@yahoo.co.nz"](#); ["canterburyaorakiboard@doc.govt.nz"](#); ["planning@mackenzie.govt.nz"](#); ["jackiekiche@hotmail.com"](#); ["rosemary@womentravel.co.nz"](#); ["inthehills@ezykonect.co.nz"](#); ["alastairbv@gmail.com"](#); ["gayleneabarnes@gmail.com"](#); ["lewis.black.94@gmail.com"](#); ["charlotte.bebbington@gmail.com"](#); ["jacqui.m.barnes@gmail.com"](#); ["smicha21@hotmail.com"](#); ["connievince@yahoo.com"](#); ["andy.cockburn@gmail.com"](#); ["sarasski@hotmail.com"](#); ["daniel.curtis@windowslive.com"](#); ["sam.jacobs.nz@gmail.com"](#); ["doyqalpress@yahoo.com"](#); ["idalziel@snap.net.nz"](#); ["dana@bluefusion.co.nz"](#); ["rlfrlfrlf@hotmail.com"](#); ["richiemcnab@hotmail.com"](#); ["stuartandjodi@xtra.co.nz"](#); ["sophiesmailbox@gmail.com"](#); ["Blake.List@plantandfood.co.nz"](#); ["bwl25@uclive.ac.nz"](#); ["blake.w.list@gmail.com"](#); ["sheila.hailstone@xtra.co.nz"](#); ["southernzephyr@gmail.com"](#); ["currance@xtra.co.nz"](#); ["katiadelu@gmail.com"](#); ["mbairdnz@gmail.com"](#); ["angulijulie@gmail.com"](#); ["cafelow@gmail.com"](#); ["emmaworters@gmail.com"](#); ["will.reiner1@gmail.com"](#); ["ar-h1991@hotmail.com"](#); ["emailjackr@gmail.com"](#); ["jane@mjaneross.com"](#); ["stignz1@gmail.com"](#); ["francescazhang64@gmail.com"](#); ["dave.evansii@gmail.com"](#); ["allancampbell.thehill@yahoo.com"](#); ["tronnoco99@gmail.com"](#); ["kandkokane@xtra.co.nz"](#); ["me.oldfield@gmail.com"](#); ["waipopo-zoo@xtra.co.nz"](#); ["dee.douq@farmside.co.nz"](#); ["qaffaney@farmside.co.nz"](#); ["julway@farmside.co.nz"](#); ["seaforthfarm@gmail.com"](#); ["jtrewin@heritage.org.nz"](#); ["aotearoawateraction@gmail.com"](#); [Lionel Hume](#); [Charlotte Wright](#); ["qdeavoll@doc.govt.nz"](#); ["haidee@irricon.co.nz"](#); ["ben.williams@chapmantripp.com"](#); ["kate.walkinshaw@timdc.govt.nz"](#); ["devethgroup@gmail.com"](#); ["jtmoffitt@farmside.co.nz"](#); ["richardsonj162@gmail.com"](#); ["sherwoodhays@gmail.com"](#)
Subject: Plan Change 7 LWRP Further Submission - Opuha Water Limited (Submitter ID: 381)
Date: Friday, 6 December 2019 2:55:40 PM

Good afternoon

Please find **attached** further submissions by Opuha Water Limited (Submitter ID: 381) in relation to various primary submissions on Plan Change 7 to the Canterbury Land and Water Regional Plan.

Kind regards,

Georgina Hamilton
Partner



Level 1, 24 The Terrace, TIMARU 7910 | PO Box 244, TIMARU 7940
PHONE: 03 687 8004 | DDI: 03 687 8065 | FAX: 03 684 4584 | EMAIL: georgina@gressons.co.nz

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**FURTHER SUBMISSION IN ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY
LAND AND WATER REGIONAL PLAN**

Clause 8 First Schedule, Resource Management Act 1991

TO: Plan Change 7 LWRP Further Submission
Environment Canterbury
PO Box 345
Christchurch 8140

By email: mailroom@ecan.govt.nz

1. Name and address of person making further submission:

Opuha Water Limited (**OWL**)

Address: c/- Gresson Dorman & Co
P O Box 244
TIMARU 7940

Contact: Georgina Hamilton

Email: georgina@gressons.co.nz

Phone: 03 687 8065

2. The proposal that the further submission relates to (the “Proposal”):

Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

3. OWL is a person with an interest in the Proposal that is greater than the general public has for the following reasons:

(a) OWL owns and operates the Opuha Dam and associated hydroelectric power, augmentation and irrigation schemes in the wider Opuha/Opihi catchment, and holds a suite of associated regional resource consents. The national and regional significance of these schemes are recognised variously in the Canterbury Regional Policy Statement and the Canterbury Land and Water Regional Plan.

(b) OWL made a primary submission on the Proposal (Submitter ID PC7-381).

4. The following is set out in **Annexure A:**

(a) The primary submissions or parts of submissions that the OWL supports or opposes; and

(b) In relation to each:

(i) The reasons for support or opposition; and

(ii) The decisions sought by the OWL in relation to those submissions or parts of submissions.

5. The addresses of the persons who made primary submissions that OWL supports or opposes are set out in **Annexure B**.
6. **Wish to be Heard:**
- (a) OWL wishes to be heard in support of its further submissions as set out in **Annexure A**.
 - (b) OWL would be prepared to consider presenting a joint case with others making similar further submissions at the hearing.



Opuha Water Limited

By its Solicitors and authorised Agents

Gresson Dorman & Co: Georgina Hamilton

Date: 6 December 2019

ANNEXURE A: OPUHA WATER LIMITED'S FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

(1) Name of person who made primary submission that is supported or opposed	(2) The particular parts of the primary submission supported or opposed		(3) Primary Submission	(4) Support/ Oppose	(5) Reasons for support or opposition of the primary submission	(6) Decision sought
	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Adaptive Management Working Group	PC7-385.1 – 37.	Section 32 Evaluation Report; Caucusing; General; 14.01A; 14.04.24; 14.04.35 - 39; 14.04.New; 14.05.29 – 30; 14.06.02. Table 14(v); Table 14(v.new); Table 14(w); Table 14(x);	As outlined in the primary submission.	Support	The submissions points are consistent with Opuha Water Limited's (OWL's) primary submission points on PC7.	That all of the submission points in the primary submission be allowed.
Opihi Flow and Allocation Working Party	PC7-382.1 - 16	General; 14.01A; 14.06B; 14.04.34; 14.04.36; 14.06.02.Tables 14(m) – (q) and (y).	As outlined in the primary submission.	Support	The submissions points are consistent with OWL's primary submission points on PC7.	That all of the submission points in the primary submission be allowed.
Orari River Protection Group	PC7-551.14	Legal Issues	Amend Plan Change 7 to align with the tightening national standards for waterways and aquifers in the OTOP sub-region.	Oppose	It is not clear from the submission point what national standards the submitter is seeking PC7 to be aligned with or what specific changes to PC7 are sought (and consequently the implications of them).	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Brown, A	PC7-109.23	Legal Issues	Require the water management plan for OTOP to align with national standards for waterways and aquifers.	Oppose	It is not clear from the submission point what national standards the submitter is seeking PC7 to be aligned with or what specific changes to PC7 are sought (and consequently the implications of them).	That the submission point be disallowed.
Westburn Farm Limited	PC7-377.1	General Investigations and Modelling	Require Plan to focus and place significant emphasis on undertaking a comprehensive zone monitoring program for the next 10 years with rigorous enforcement, will ensure that the data and the science will adequately prepare farmers for future plan changes.	Support	The absence of suitable (and in some instances any) monitoring data to inform policy decisions under PC7 has been a fundamental shortcoming of the plan development process. OWL therefore strongly supports the submitter's request for a comprehensive zone-wide monitoring program for the next 10 years.	That the submission point be allowed.
Spencer-Bower, M J	PC7-473.9	General Investigations and Modelling	Require water quality changes to be monitored through a comprehensive water quality and ecosystem health monitoring program.	Support	The absence of suitable (and in some instances any) monitoring data to inform policy decisions under PC7 has been a fundamental shortcoming of the plan development process. OWL therefore strongly supports the submitter's request for a comprehensive monitoring programme for water quality and ecosystem health.	That the submission point be allowed.
Water and Wildlife Habitat Trust	PC7-88.101	Minimum flows	Amend minimum flows to increase limits by 30% to account for scientific uncertainty and the predicted hydrological effects of a changing climate.	Oppose	The decision sought is not justified on ecological or economic grounds, nor is it required to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Future Rivers	PC7-348.4	Minimum flows	Amend Plan Change 7 so that river minimum flows are based on scientific best practice.	Oppose	It is not clear from the submission point what changes to PC7 is being sought, and consequently the implications of the submissions for water abstractors.	That the submission point be disallowed.
New Zealand Salmon Anglers Association	PC7-542.4	Habitats of Indigenous Species	Amend Plan Change 7 to improve indigenous fish habitat by restricting the fluctuations of hydro flows.	Oppose	Contrary to the submission point, fluctuations in hydro flows can improve indigenous fish habitat.	That the submission point be disallowed.
New Zealand Salmon Anglers Association	PC7-542.4	Habitats of Indigenous Species	Amend Plan Change 7 to improve indigenous fish habitat by ceasing water takes when river temperatures exceed 19 degrees Celsius.	Oppose	The submission point has no scientific basis.	That the submission point be disallowed.
Water and Wildlife Habitat Trust	PC7-88.5	02.09.Bank	Insert a definition of "bank" of a river or stream.	Oppose	OWL considers the decision sought by the submitter to be unnecessary and inappropriate.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.208	02.09.Bank	Insert a definition for "bank" of a river or stream.	Oppose	OWL considers the decision sought by the submitter to be unnecessary and inappropriate.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.125	02.09.Waipuna / Springs	Insert definition for waipuna/springs.	Support	OWL considers the decision requested would aid interpretation and administration of PC7.	That the submission point be allowed.
Orari River Protection Group	PC7-551.13	General Seeking Amendment	Amend Plan Change 7 to implement the OTOP ZIPA sooner than five years after	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for water users and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought	That the submission point be disallowed.

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			2022 and to implement the plan as soon as possible.		by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	
Brown, A	PC7-109.22	Non-regulatory actions	Require the OTOP Zone Committee to implement this plan sooner than five years beyond 2022.	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for water users and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.197	Farm Portal	Arowhenua is also concerned that advice from the GMP Technical Working Group with regard to the reliability of the fertiliser and irrigation proxies of the Farm Portal may impede or diminish the outcomes intended by this amendment, should this part of Plan Change 7 proceed. The fertiliser and irrigation proxy are central to those components of Plan Change 7 that are seeking to manage to freshwater limits. Assurance is sought that this will not be the case.	Support	OWL considers the clarification sought by the submitter to be appropriate.	That the submission point be allowed.

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Rangitata Dairies Limited Partnership	PC7-316.12	General Investigations and Modelling	Require groundwater levels and nitrate concentrations to be monitored and reported accordingly so the public can see how the levels and concentrations are trending, and how the policies and rules are affecting the trends.	Support	The absence of suitable (and in some instances any) monitoring data to inform policy decisions has been a fundamental shortcoming of the PC7 development process. OWL therefore strongly supports the submitter's request for monitoring and reporting, as it believes this data is essential for tracking progress against PC7's policies/rules and otherwise will help inform future plan changes.	That the submission point be allowed.
Adams, M	PC7-554.1	General Investigations and Modelling	Require the Fairlie Basin, Ashwick Flat and Sherwood Downs areas be separated and tested individually to more accurately identify "hotspots" and manage these accordingly.	Support	OWL considers that a comprehensive water quality monitoring programme will be critical to the future management of farming activities within the "hotspot" zones.	That the submission point be allowed.
Wainono Dairy Ltd Upper Opihi-Opuha Catchment Group Biggs Agriculture Ltd	PC7-237.13 PC7-238.13 PC7-221.6	General Investigations and Modelling / General	Require ECan's groundwater team to conduct a review of all available groundwater monitoring data to determine which wells should be monitored against ZIPA outcomes to ensure they are representative of the groundwater zone in which they are located.	Support	OWL considers it essential that future groundwater monitoring undertaken by ECan accurately represents the groundwater quality in the groundwater zones, and therefore strongly supports the decision sought.	That the submission points be allowed.
Wainono Dairy Ltd	PC7-237.16 PC7-238.16	General Investigations and Modelling	Require an extensive groundwater monitoring program is in place to track water quality	Support	OWL considers that a comprehensive water quality monitoring programme will be critical to the	That the submission points be allowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Upper Opihi-Opuha Catchment Group			improvements in High Nitrogen Concentration Areas.		future management of farming activities within the HCNAs.	
Canterbury Aoraki Conservation Board	PC7-138.6	General allocation and limits	Amend the Orari-Temuka-Opihi-Pareora flow and allocation regimes to speed up the recovery process for waterways in the zone.	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for water users and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission points be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.193	Minimum flows	Oppose environmental flows and allocation limits and the timeframes set for reductions to take place for the Te Umu Kaha/Temuka River, Ōpūaha/Opuha River and Te-Ana-a-Wai/Te Ana Wai River.	Oppose in part	<p>OWL's interest in this submission point is limited to the extent that it addresses "the environmental flows, allocation limits and timeframes for reductions to take place" for the Ōpūaha/Opuha and Te-Ana-a-Wai/Te Ana Wai Rivers.</p> <p>The basis for the submission point appears to relate to the submitter's concerns about the sufficiency of the proposed flows for maintaining natural processes, water levels, prevent nutrient enrichment at the hāpua or protect indigenous biodiversity at key life stages e.g. the migration of large tuna (eels).</p> <p>OWL notes that Section 14.6.2 of PC7 does not prescribe any specific flows or limits for the Opuha River mainstem; it is therefore not clear what part of PC7 the submission point relates to.</p>	That the submission point be disallowed to the extent that it would result in a decision inconsistent with that sought in the AMWG's primary submission relating to the environmental flows and allocation limits for the Ōpūaha/Opuha River.

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					<p>OWL's primary submission addresses this gap in PC7 and believes that the proposed flow regime for the Opuha River mainstem (forming part of the AMWG's new Table 14(v(ii) and included in OWL's primary submission) will achieve the relevant statutory tests for water quantity and quality and implement the various objectives and policies of the Canterbury Land and Water Regional Plan that are focused on the matters raised in the submission point.</p> <p>In relation to the submitter's concerns about the flow and allocation regime for the Te Ana Wai River, OWL notes that those flows and limits based on the considerable work undertaken by the Opihi Flow and Allocation Working Party prior to the finalisation of the OTOP ZIPA and notification of PC7. They are based on ecological advice and are expected to achieve the relevant statutory tests for water quantity and quality and implement the various objectives and policies of the Canterbury Land and Water Regional Plan that are focused on the matters raised in the submission point.</p>	
Mackenzie District Council	PC7-457.10	Minimum flows	Require the location of recorder sites for the purpose of environmental flows and allocation regimes is, at a	Oppose	The submission point fails to recognise the historical context within which the flow measurement sites for the environmental flows in the mainstem of the Opihi River were established	That the submission point be disallowed.

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			minimum, in the same location for all permit holders.		and environmental flow conditions have historically been managed. OWL strongly opposes the request make by the submitter for that reason, and on the basis of previous hydrological advice it has received (via the Adaptive Management Working Group) that changing the current flow measurement sites would be, from a hydrological perspective, very complicated and therefore costly.	
Newton, J	PC7-541.1	Minimum flows	Amend minimum flow provisions so outcomes are achieved earlier and not in two stages.	Oppose	For the reasons set out in OWL's primary submission on PC7, OWL considers it appropriate for: <ul style="list-style-type: none"> The "first stage" of environmental flows for the mainstem of the Opihi River under Table 14(v), subject to OWL's requested amendments, to take effect from 1 January 2025; and The second stage environmental flows for the mainstem of the Opihi River under Table 14(w) PC7 to be deleted. OWL also believes that any reduction in the proposed timeframes for implementation of the "first stage" of environmental flows is not justified in terms of ecological or other environmental benefits, and would have a considerable impact	That the submission point be disallowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
					on the economic viability of farm businesses that hold water permits affected by those flows.	
Brown, A	PC7-109.18	Minimum flows	Require a higher minimum flow be established and be reviewed annually.	Oppose	OWL considers the decision sought to be inappropriate and unnecessary.	That the submission point be disallowed.
Neave, R	PC7-85.7	Minimum flows	Amend PC7 to give priority to minimum water flows and the ecological health of all our waterways.	Oppose	The submission point fails to recognise that PC7's provisions must comply with certain statutory tests and implement the objectives and policies of the Canterbury Regional Policy Statement. It is also unclear what the submitter means by "give priority to minimum water flows".	That the submission point be disallowed.
Iles, H	PC7-310.22	Water quality (general except nitrate)	Amend Section 14 to reduce the time frame for achieving water quality targets below 3-5 years.	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for water users and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.192	Water quality (general except nitrate)	Amend Plan Change to improve water quality and quantity rather than providing for, and maintaining, the status quo.	Oppose	OWL does not share the views of the submitter that PC7 provides for and maintains the status quo. It is also not clear from the submission what changes are sought to PC7, and therefore the implications of such changes.	That the submission point be disallowed.

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Mackenzie District Council	PC7-457.9	Nitrate – Reductions	Require time frames for nutrient management to be carefully considered and achievable from social, economic and environmental perspectives.	Support	OWL strongly supports the submission point as it agrees the RMA requires timeframes for the implementation of nutrient management policy and rules in PC7 must be achievable from social, economic and environmental perspectives.	That the submission point be allowed.
Midgley, A	PC7-72.11	Nitrate – Reduction	Amend the provisions requiring nitrate reductions to phase out high applications sooner.	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for consent holders and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Barnes Family Farms Limited; Black, L Bebbington, C; Barnes, J; Michael, S; Christensen, C; Cockburn, A; Campbell, S; Curtis, D; Jacobs, S; Gallagher, K; Dalziel, J; Dopleach, D; Frankland, R; McNab, R; Oldham, J; McInnes, S; List, B; Hailstone, S; Cotter, J; Currie, M; De Lu, K; Baird, M; Downard, J; Low, C; Perriam, E; Reiner, W; Ridden-Harper, A; Robertson, J; Ross, M J;	PC7-94.16 PC7-128.5 PC7-320.5 PC7-461.5 PC7-147.5 PC7-321.5 PC7-163.5 PC7-164.5 PC7-241.5 PC7-395.5 PC7-93.5 PC7-215.5 PC7-258.5 PC7-83.5 PC7-366.5 PC7-77.5	Nitrate – Reduction	Supports higher required reductions in nitrogen losses in High Nitrogen Concentration Areas beyond GMP but want to see greater reductions required in the life of this current plan	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for consent holders and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitters is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.

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Tie, M A; Zhang, F; Evans, D J	PC7-250.5 PC7-124.5 PC7-466.5 PC7-106.8 PC7-463.5 PC7-256.5 PC7-268.5 PC7-261.5 PC7-99.5 PC7-398.5 PC7-119.5 PC7-388.5 PC7-116.5 PC7-78.6 PC7-81.3 PC7-123.7					
Brown, A	PC7-109.15	Nitrate – Reductions	Require the nitrate reductions be made by 5 and a half years instead of 11 years proposed in the plan	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for consent holders and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Campbell, A	PC7-7.1	General	Require modification of the Opuha Dam outlet to discharge only epilimnetic water into the lower river.	Oppose	The decision sought relates to decisions around management of infrastructure owned and operated by OWL, which OWL considers is outside the scope of a regional plan.	That the submission point be disallowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Orari River Protection Group	PC7-551.9	14.000.High Nitrogen Concentration Areas	Amend the Plan Change 7 provisions in Section 14 so that the targets for reduction of nitrates in high nitrogen concentration areas occurs sooner than five years after 2023.	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for consent holders and the wider OTOP community of reducing timeframes for implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Tronnoco Farming Co Ltd; O'Kane, K & K; Oldfield, M E; Waipopo Farm Limited; Cotter, D & D; Belper Farm Ltd; Phillips Farming Ltd; Seaforth Farm Ltd.	PC7-210.2 PC7-354.2 PC7-134.2 PC7-375.2 PC7-284.2 PC7-120.2 PC7-364.2 PC7-253.24	14.01A. Augmentation	Insert a new definition of augmentation as follows: <u>means the discharge of water the Seadown Drain for the primary purpose of improving flows and/or water quality.</u>	Oppose in part	OWL understands the submitter's request for the inclusion of a new definition for "augmentation". However, it notes that the term is used elsewhere in PC7, including in relation to the Opuha Dam. Should a definition be included in PC7 as a result of the submission, OWL notes that it would need to be all encompassing rather than specific to the Seadown Drain.	That the submission point be allowed, subject to OWL's further submission.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.4	14.04.02	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>	Oppose in part	OWL understands the basis on which the submitter has sought this decision. However, OWL is concerned that the proposed wording goes beyond the intended scope of Policy 14.04.02 as notified and is inaccurate as not all of the activities listed require (or should require) resource consent under PC7.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.150	14.04.02	Amend Policy 14.4.2 as follows: Recognise and provide for the cultural importance of the Orari-	Oppose	OWL considers the decision sought would be inconsistent with the higher order directives of the Canterbury Land and Water Regional Plan and	That the submission point be disallowed.

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			Temuka-Opihi-Pareora sub-region to Ngāi Tahu by requiring any resource consent application to use land for a farming activity, or to take and use water, or to discharge contaminants, to demonstrate how potential adverse effects of these activities on culturally significant sites will be avoided or mitigated.		PC7 and otherwise is not necessary to achieve the relevant statutory tests for regional plan provisions.	
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.182	14.04.03	Retain Policy 14.4.3 as notified.	Support	OWL considers the Policy as notified appropriate and necessary to achieve the relevant statutory tests.	That the submission point be allowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.181 & 182	14.04.04 / 14.04.05	Retain Policies 14.4.4 and 14.4.5 as notified, provided they can be implemented in a practical and cost-effective manner.	Support	OWL agrees that implementation must be practical and cost-effective.	That the submission point be allowed.
Heritage New Zealand Pouhere Taonga	PC7-331.9	14.04.05	Amend Policy 14.4.5 by inserting a new clause as follows: <u>d. in respect of rock art, the implementation of actions or methods to avoid adverse effects</u>	Oppose	It is unclear why the additional clause (d) is required, given the direction in clause (c). The decision sought would (together with the submitter's other submission points on this provision), in effect, introduce a hierarchy of protections between the listed Ngāi Tahu values, which does not appear to align with any higher order planning directives.	That the submission point be disallowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Heritage New Zealand Pouhere Taonga	PC7-331.3	14.04.05	Amend clause (c) of Policy 14.4.5 as follows: c. <u>in respect of springs and freshwater mataitai</u> , the implementation of actions or methods to avoid or minimise adverse effects.; and	Oppose	The decision sought would (together with the submitter's other submission points on this provision), in effect, introduce a hierarchy of protections between the listed Ngāi Tahu values, which does not appear to align with any higher order planning directives.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.152	14.04.06B	Delete Policy 14.4.6B in its entirety.	Oppose	<p>The submitter considers that the Policy is uncertain and would not provide for ecosystem health as required by Te Mana o te Wai, amongst other concerns that appear unrelated to the proposed Policy.</p> <p>The submitter has failed to understand that the intention of the proposed Policy is to explain the basis on which the "B" block allocations were set, i.e. in part to enable a high flow take to off-set reductions in reliability resulting from the "A" environmental flows proposed through PC7. In OWL's view, the Policy is certain and logical as an implementing policy for the "B" block regimes provided in Section 14.6.2 of PC7.</p>	That the submission point be disallowed.
Aotearoa Water Action	PC7-209.6	14.04.07	Amend Policy 14.4.7 so that there is no allowance for the replacement of stream-depleting takes and surface water takes with deeper groundwater takes.	Oppose	The submitter has failed to fully understand the underlying basis for Policy 14.4.7 and related rules. The provision for water permit "swaps" is a means by which to assist in phasing out over-allocation of surface waters and consequently improve instream environments. The decision sought by the submitter is therefore contrary to the wider objectives and policies of the Canterbury	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
					Land and Water Regional Plan, and the National Policy Statement for Freshwater Management 2017 (NPSFM).	
Royal Forest & Bird Protection Society Inc.	PC7-472.154	14.04.08	Delete Policy 14.4.8 in its entirety.	Oppose	The submitter considers that the Policy is uncertain and would not provide for ecosystem health as required by Te Mana o te Wai, amongst other concerns that appear unrelated to the proposed Policy.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.155	14.04.09	Delete Policy 14.4.9 in its entirety.	Oppose	The submitter considers that the Policy is uncertain and would not provide for ecosystem health as required by Te Mana o te Wai, amongst other concerns that appear unrelated to the proposed Policy.	That the submission point be disallowed.
Rangitata Dairies Limited Partnership	PC7-316.3	14.04.11	Amend Policy 14.4.11 to require consideration of the availability and reliability of scheme water.	Support	OWL agrees that the Policy should be subject to availability and reliability of scheme water.	That the submission point be allowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.156	14.04.12	Delete Policy 14.4.12 in its entirety.	Oppose	The underlying basis for the submission point appears related to the submitter's lack of an understanding of the historical framework for water permits in the wider Opihi catchment and augmentation of the mainstem of the Opihi River. It is essential that there be a different regime for	That the submission point be disallowed.

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					permits that are supplied with water from the Opuha Dam.	
Royal Forest & Bird Protection Society Inc.	PC7-472.157	14.04.13	Delete Policy 14.4.13 in its entirety, or amend to require that 100% be surrendered and returned.	Oppose	As this policy addresses the phasing out of overallocation, the decision sought would not give effect to the NPSFM. The submitter's alternative request for 100% of consented allocation to be surrendered is unjustified and not required to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.6	14.04.14	Delete Policy 14.4.14 and replace with: <u>For any proposal to introduce new water from outside a catchment it must:</u> <u>(a) Avoid diminishing the mauri of the receiving water body and the source water body</u> <u>(b) Show evidence of any consultation undertaken with Te Rūnanga o Ngāi Tahu and Papatipu Rūnanga</u> <u>(c) Have particular regard to the values and customs of Te</u>	Oppose in part	While OWL appreciates the basis for the submitters' concerns, the decision sought appears to cut across the matters addressed by Policy 4.56 of the Canterbury Land and Water Regional Plan. In OWL's view, a plan change is likely to be required in accordance with Policy 4.56 to address any out-of-catchment water source, and consideration may need to be given to how the submitter's request fits with Policy 4.56.	That the submission point be allowed, subject to OWL's further submission.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
			<u>Rūnanga o Ngāi Tahu or Papatipu Rūnanga</u>			
Royal Forest & Bird Protection Society Inc.	PC7-472.159	14.04.14	Amend Policy 14.4.14 to provide for Te Mana o Te Wai.	Oppose	It is unclear what specific changes to the policy is required to address the submitters concerns and the implications of them.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.158	14.04.14	Amend clause (b) of Policy 14.4.14 as follows: (b) decision makers having particular regard <u>give effect to</u> any views expressed by Te Rūnanga o Ngāi Tahu and papatipu rūnanga, and in particular any views expressed regarding the extent to which the proposal diminishes the mauri of freshwater resources or compromises values or customs.	Oppose	The decision sought is unnecessary and inappropriate.	That the submission point be disallowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.194	14.04.15	Retain Policy 14.4.15 as notified.	Support	OWL considers that the Policy is an appropriate and necessary inclusion in Section 14 of the Canterbury Land and Water Regional Plan.	That the submission point be allowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Royal Forest & Bird Protection Society Inc.	PC7-472.160	14.04.15	Amend Policy 14.4.15 so that livestock means all farmed animals.	Oppose	The decision sought by the submitter is neither necessary or appropriate to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.195	14.04.16	Retain Policy 14.4.16 as notified.	Support	OWL considers that the Policy is an appropriate and necessary inclusion in Section 14 of the Canterbury Land and Water Regional Plan.	That the submission point be allowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.161	14.04.16	Amend Policy 14.4.16 so that livestock means all farmed animals.	Oppose	The decision sought by the submitter is neither necessary or appropriate to achieve the relevant statutory tests for regional plan provisions.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.74	14.04.19	Amend Policy 14.4.19 to insert a new clause as follows: <u>d. if the water quality targets in Table 14(g) are achieved, the further reductions in nitrogen loss beyond Baseline GMP Loss Rates, or consent nitrogen loss rates, in accordance with Table 14(zc), do not apply to a resource consent for a farming activity.</u>	Support	OWL considers that the decision sought is appropriate and necessary.	That the submission point be allowed.
DairyNZ Limited	PC7-357.49	14.04.19	Amend clause (a) of Policy 14.4.19 as follows:	Support	OWL considers that the decision sought is appropriate and necessary.	That the submission point be allowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
			a. all resource consents granted for farming activities that require the preparation of a nutrient budget, being subject to consent conditions requiring further reductions in nitrogen loss beyond Baseline GMP Loss Rates, or consented nitrogen loss rates, in accordance with Table 14(zc), <u>until the water quality targets in Table 14(g) are achieved</u>			
DairyNZ Limited	PC7-357.73	14.04.19	Amend clause (b) of Policy 14.4.19 as follows: b. limiting the duration of for any resource consent for a farming activity that is required to make further reductions in nitrogen loss (beyond Baseline GMP Loss Rates or consented nitrogen loss rates) in accordance with Table 14(zc), to no more than ten years and only imposing one reduction beyond Baseline GMP Loss Rates or consented nitrogen loss rates per consent term, <u>until the water quality targets in Table 14(g) are achieved</u> ; and	Support	OWL considers that the decision sought is appropriate and necessary.	That the submission point be allowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
DairyNZ Limited	PC7-357.51	14.04.20	Amend clause (c) of Policy 14.4.20 as follows: c. for properties within the Rangitata Orton High Nitrogen Concentration Area, Fairlie Basin High Nitrogen Concentration Area and Levels Plain High Nitrogen Concentration Area, <u>until the water quality targets in Table 14(g) are achieved</u> , the applicant commits to achieving the percentage-based nitrogen loss reduction in Table 14(zc).	Support	OWL considers that the decision sought is appropriate and necessary.	That the submission point be allowed.
Department of Conservation	PC7-160.104	14.04.35	Amend clause (e) of Policy 14.4.35 to define a maximum period for when flows can be kept at Level 2 flow regime to compensate for the volume of water released for the fresh and avoid flat lining for extended periods, regardless of the monthly varying minimum flows. Or, as an alternative option for flow releases: Ensure a given frequency of freshes with a minimum interval are observed at the flow recorder site at Saleyards Bridge during this period (e.g.	Oppose in part	OWL supports the first limb of the submission point but strongly opposes the second (alternative) limb of the submission point. In relation to the first limb of the submission point, OWL notes that: <ul style="list-style-type: none"> Proposed Policy 14.4.35(e) already limits the time flow can be reduced to Level 2 to “a period of time sufficient to compensate for the volume of water released during the flush.” OWL has sought in its primary submission on PC7 to clarify the volumes of water involved in artificial freshes e.g. defining the volumes associated with “small” and “large” freshes, so as to provide a limit to the time the flow can be reduced. 	That: <ul style="list-style-type: none"> the first limb of the submission point be allowed; and the second (alternative) limb of the submission point be disallowed.

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			FRE ₃ events, 10x the preceding baseflow).		<ul style="list-style-type: none"> The request that flat lining for extended periods, regardless of the monthly varying minimum flows, be avoided is consistent with the views of OWL and the Adaptive Management Working Group (AMWG) and one of the key considerations underlying the AMWG's original proposal for monthly average minimum flows to allow variability. In this regard, OWL notes that the instantaneous or daily average minimum flows at Saleyards Bridge (preferred by ECan and incorporated into PC7) tends to encourage flat-lining by promoting reduced Opuha flows whenever Opihi flows are higher and vice versa. <p>In relation to the second (alternative) limb of the submission point, OWL notes that previous studies conducted by Measures and Bind (2012) confirm that it is not practical to set artificial fresh requirements at Saleyards bridge as there is significant attenuation of fresh peak flow and volume as pulse flows travel along the length of the Opuha to the Opihi Confluence. This means that by the time a fresh reaches Saleyards bridge it is much harder to define its volume in order to calculate compensatory reductions in minimum flow.</p> <p>It is also noted that it is much more difficult to design flushes to achieve a specified peak flow at</p>	

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					<p>Saleyards. Flow metrics such as FRE3 and 10x the preceding baseflow are not good indicators of flush effectiveness. These metrics have been used primarily for statistical studies comparing multiple rivers and are not particularly useful for flow regime design in regulated rivers downstream of dams. Early trial flushing flows on the Opuha river using such metrics were largely ineffective and there are also challenges around defining what FRE3 and 10x the pre-ceding baseflow mean in a regulated river.</p> <p>For these reasons it is OWL's preference for PC7 to define fresh requirements loosely, e.g. as a required volume per fresh, and to use an adaptive management approach involving consultation with key stakeholders to decide on the preferred flush hydrograph based on the river conditions and priorities at the time of the fresh.</p> <p>For completeness, OWL notes the submitters suggestion (in its primary submission) that <i>"...relating [flow releases] back to the natural distribution and timing of fresh/flood flows would also benefit native fish migration requirements (as opposed to an aesthetic outcome), many of which occur in the November to March period. Such flow releases also need to be of sufficient magnitude to ensure mouth openings, especially in January and February (which have lower minimum flows and when dissolved oxygen- and temperature related stress are more likely to occur."</i></p>	

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					OWL notes that the decisions sought in its primary submission on PC7 includes raising the minimum flows in January and February (and lowering the minimum flows at other times of year such that the same volume of water is required) to help achieve mouth openings and reduce dissolved oxygen and temperature related stress in January and February.	
Royal Forest and Bird Protection Society Inc	PC7-472.178	14.04.35	Delete Policy 14.4.35 in its entirety.	Oppose	<p>OWL strongly opposes the submitter's request that Policy 14.4.35 be deleted, particularly given its role as an implementing policy for the environmental flow and allocation regimes for the Opihi River mainstem set out in Section 14.6.2 of PC7.</p> <p>The underlying basis for the submission point appears related to the submitter's lack of an understanding of the historical framework for water permits in the wider Opihi catchment and augmentation of the mainstem of the Opihi River.</p>	That the submission point be disallowed.
Royal Forest and Bird Protection Society Inc	PC7-472.179	14.04.36	Delete Policy 14.4.36 in its entirety.	Oppose	<p>OWL strongly opposes the submitter's request that Policy 14.4.36 be deleted, particularly given its role as an implementing policy for the environmental flow and allocation regimes for the Opihi River mainstem set out in Section 14.6.2 of PC7.</p> <p>The underlying basis for the submission point appears related to the submitter's lack of an understanding of the historical framework for</p>	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
					water permits in the wider Opihi catchment and augmentation of the mainstem of the Opihi River.	
Department of Conservation	PC7-160.94	14.04.36	Retain Policy 14.4.36 as notified.	Oppose	In its primary submission on PC7, OWL has sought minor amendments to Policy 14.4.36(b) and (d). OWL therefore opposes the decision sought in the submission point to the extent that it is inconsistent with OWL's primary submission on Policy 14.4.36.	That the submission point be disallowed in relation to Policy 14.4.36(b) and (d), and otherwise be allowed.
Royal Forest and Bird Protection Society Inc	PC7-472.180	14.04.37	Delete Policy 14.4.37 in its entirety.	Oppose	<p>OWL strongly opposes the submitter's request that Policy 14.4.37 be deleted, particularly given its role as an implementing policy for the environmental flow and allocation regimes for the Opihi River mainstem set out in Section 14.6.2 of PC7.</p> <p>The underlying basis for the submission point appears related to the submitter's lack of an understanding of the historical framework for water permits in the wider Opihi catchment and augmentation of the mainstem of the Opihi River.</p>	That the submission point be disallowed.
Royal Forest and Bird Protection Society Inc	PC7-472.181	14.04.38	Delete Policy 14.4.38 in its entirety.	Oppose	OWL strongly opposes the submitter's request that Policy 14.4.37 be deleted, particularly given its role as an implementing policy for the environmental flow and allocation regimes for the Opihi River mainstem set out in Section 14.6.2 of PC7.	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
					The underlying basis for the submission point appears related to the submitter's lack of an understanding of the historical framework for water permits in the wider Opihi catchment and augmentation of the mainstem of the Opihi River.	
Department of Conservation	PC7-160.95	14.04.38	Amend Policy 14.4.38 so that the application of Level 1 or Level 2 alternative minimum flow is assessed on a weekly or at least two-weekly cycle.	Oppose in part	To the extent that the submission point seeks that the application of a Level 1 or Level 2 alternative minimum flow to be assessed more frequently than on the first day of the month, as proposed by PC7, OWL supports the submission point. However, for the reasons outlined in OWL's primary submission on PC7, its preference is for the application of a Level 1 or Level 2 alternative minimum flow to be able to be assessed on any day of the month.	That the submission point be disallowed.
Royal Forest and Bird Protection Society Inc	PC7-472.182	14.04.39	Delete Policy 14.4.39 in its entirety.	Oppose	<p>OWL strongly opposes the submitter's request that Policy 14.4.37 be deleted, particularly given its role as an implementing policy for the environmental flow and allocation regimes for the Opihi River mainstem set out in Section 14.6.2 of PC7.</p> <p>The underlying basis for the submission point appears related to the submitter's lack of an understanding of the historical framework for water permits in the wider Opihi catchment and augmentation of the mainstem of the Opihi River.</p>	That the submission point be disallowed.

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Royal Forest & Bird Protection Society Inc.	PC7-472.183	14.04.40	Delete Policy 14.4.40 in its entirety.	Oppose	OWL strongly opposes the decision sought by the submitter. Deletion of Policy 14.4.40 would preclude the ability to manage individual consents held by members of the Opuha Scheme through a global consent or consents.	That the submission point be disallowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.224	14.04.40	Amend Policy 14.4.40 as follows: Contribute to the overall management of surface water flows within the Opihi Freshwater Management Unit, by providing for the transfer of AA ₁ and BA and Kakahu surface water permits to a principal water supplier where this will result in a single permits authorising the abstraction of all transferred AA and BA abstractions of surface water.	Support	OWL supports the decision sought by the submitter, which is consistent with the relief sought in its primary submission that the PC7 planning framework should enable global management of water on a catchment by catchment scale, rather than simply on a scheme-wide scale as would be the case if the Policy was retained in its current form.	That the submission point be allowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.225	14.04.41	Retain Policy 14.4.41 as notified, provided the requirement (e.g. 30% reduction) is achievable and reasonable.	Support	OWL considers that the Policy is an appropriate and necessary, and agrees with the submitter that the reductions required by it must be achievable and reasonable.	That the submission point be allowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
DairyNZ Limited	PC7-357.50	14.04.New	<p>Insert a new policy as follows:</p> <p>Policy 14.4.19A</p> <p><u>Inform successive plan review cycles and consenting requirements by reporting every 5 years on:</u></p> <p><u>a. the current state of freshwater quality and ecosystem health, and any trends observed; and</u></p> <p><u>b. the results of any relevant investigations carried out in relation to the groundwater system; and</u></p> <p><u>c. progress made towards freshwater outcomes and limits, including an assessment of the effectiveness of the framework, (including any non-statutory actions) in achieving those outcomes and limits.</u></p>	Support	OWL considers the directives contained in the new policy proposed by the submitter are essential to support future plan reviews.	That the submission point be allowed.
Fox Peak Station Limited	PC7-166.12	14.05.04	<p>Amend condition 1 of Rule 14.5.4 as follows:</p> <p>1. The take, in addition to all existing consented takes, does not result in an exceedance of</p>	Support	OWL supports the decision sought by the submitter as an alternative to the decision sought in its primary submission on PC7 regarding a new rule governing takes from Lake Opuha.	That the submission point be allowed.

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			any minimum flow limit set in Tables 14(h) to 14(za) <u>and Lake level limit set in Table 14(y) unless an agreement with Ophua Water Ltd, is in place that allows water to be taken to lower lake levels;</u> and			
Fox Peak Station Limited	PC7-166.15	14.05.04	Amend Rule 14.5.4 to provide for taking water directly from Lake Opuha.	Support	OWL supports the decision sought by the submitter as an alternative to the decision sought in its primary submission on PC7 regarding a new rule governing takes from Lake Opuha.	That the submission point be allowed.
Royal Forest and Bird Protection Society Inc	PC7-472.185	14.05.07	Amend Rule 14.5.7 to include potential adverse effects on ground water indigenous biodiversity.	Oppose	OWL considers the proposed amendment unnecessary and inappropriate.	That the submission point be disallowed.
Fonterra Co-operative Group Limited	PC7-416.12	14.05.08	Delete Rule 14.5.8 in its entirety.	Support	OWL considers the decision sought is appropriate.	That the submission point be allowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.236	14.05.08	Amend the activity status of Rule 14.5.8 from a prohibited activity to a non-complying activity.	Support	OWL considers that the submitter's request for a less-restrictive activity status is appropriate.	That the submission point be allowed.
Royal Forest and Bird Protection Society Inc	PC7-472.187	14.05.09	Amend Rule 14.5.9 to include potential adverse effects on ground water indigenous biodiversity.	Oppose	OWL considers the proposed amendment unnecessary and inappropriate.	That the submission point be disallowed.

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Royal Forest and Bird Protection Society Inc	PC7-472.188	14.05.10	Amend Rule 14.5.10 to include potential adverse effects on ground water indigenous biodiversity.	Oppose	OWL considers the proposed amendment unnecessary and inappropriate.	That the submission point be disallowed.
Royal Forest and Bird Protection Society Inc	PC7-472.189	14.05.11	Amend Rule 14.5.11 to include potential adverse effects on ground water indigenous biodiversity.	Oppose	OWL considers the proposed amendment unnecessary and inappropriate.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc.	PC7-472.190	14.05.12	Amend Rule 14.5.12 to surrender 100% if catchment is over allocated.	Oppose	OWL considers that the decision sought is unnecessary in order to achieve the higher order planning directives and is otherwise in appropriate.	That the submission point be disallowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.242	14.05.13	Amend the activity status of Rule 14.5.13 from a prohibited activity to a non-complying activity.	Support	OWL considers that the submitter's request for a less-restrictive activity status is appropriate.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.22	14.05.14	Amend Rule 14.5.14 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.

(1) Name of person who made primary submission that is supported or opposed	(2) The particular parts of the primary submission supported or opposed		(3) Primary Submission	(4) Support/ Oppose	(5) Reasons for support or opposition of the primary submission	(6) Decision sought
	Submission point reference	Plan Change 7 (PC7) Provision				
DairyNZ Limited	PC7-357.55	14.05.15	Retain Rule 14.5.15 as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.23	14.05.15	Amend Rule 14.5.15 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.56	14.05.16	Retain Rule 14.5.16 as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.24	14.05.16	Amend Rule 14.5.16 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.57	14.05.16A	Retain Rule 14.5.16A as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.25	14.05.16A	Amend Rule 14.5.16A to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.26	14.05.16B	Amend Rule 14.5.16B to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.58	14.05.16B	Retain Rule 14.5.16B as notified.	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.27	14.05.17	Amend Rule 14.5.17 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may	That the submission point be disallowed.

(1) Name of person who made primary submission that is supported or opposed	(2) The particular parts of the primary submission supported or opposed		(3) Primary Submission	(4) Support/ Oppose	(5) Reasons for support or opposition of the primary submission	(6) Decision sought
	Submission point reference	Plan Change 7 (PC7) Provision				
					compromise PC7's ability to fully implement the objectives and policies of the Plan.	
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.28	14.05.18	Amend Rule 14.5.18 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.60	14.05.18	Retain Rule 14.5.18 as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.
DairyNZ Limited	PC7-357.61	14.05.19	Amend matter of discretion 8 of Rule 14.5.19 as follows: 8. For properties within a High Nitrogen Concentration Area, the methods and timeline within the Farm Environment Plan for achieving the nitrogen loss reductions set out in Table 14(zc) <u>until the water quality targets in Table 14(g) are achieved</u> ; and	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.29	14.05.19	Amend Rule 14.5.19 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.30	14.05.20	Amend Rule 14.5.20 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.62	14.05.20	Retain Rule 14.5.20 as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.31	14.05.21	Amend Rule 14.5.21 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may	That the submission point be disallowed.

(1) Name of person who made primary submission that is supported or opposed	(2) The particular parts of the primary submission supported or opposed		(3) Primary Submission	(4) Support/ Oppose	(5) Reasons for support or opposition of the primary submission	(6) Decision sought
	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
					compromise PC7's ability to fully implement the objectives and policies of the Plan.	
DairyNZ Limited	PC7-357.63	4.05.21	Retain Rule 14.5.21 as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.32	14.05.22	Amend Rule 14.5.22 to align with or exceed the rules proposed by the NES for Freshwater 2019 as they relate to farming and nutrient management.	Oppose	OWL notes that the NES for Freshwater 2019 is a Draft NES and has not statutory effect until it is gazetted. It also addresses farming activities and nutrient management in a different way to the Canterbury Land and Water Plan. The decision sought by the submitter could therefore result in internal Plan inconsistencies, and may compromise PC7's ability to fully implement the objectives and policies of the Plan.	That the submission point be disallowed.
DairyNZ Limited	PC7-357.64	4.05.22	Retain Rule 14.5.22 as notified.	Support	OWL considers that the submitter's request appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.35	14.05.23	Delete notification note for Rule 14.5.23.	Oppose	The decision sought is not consistent with rules addressing the same subject matter throughout the Canterbury Land and Water Regional Plan. It is appropriate in OWL's view for the notification note to remain as notified.	That the submission point be disallowed.
Royal Forest and Bird Protection Society Inc	PC7-472.191	14.05.23	Amend Rule 14.5.23 to ensure staged reductions occur faster.	Oppose	For the reasons set out in OWL's primary submission on PC7 in relation to the significant implications for consent holders and the wider OTOP community of reducing timeframes for	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
n.snoyink@forestandbird.org.nz					implementation, it considers the decision sought by the submitter is inappropriate and unnecessary to achieve the relevant statutory tests for regional plan provisions.	
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.254	14.05.23	Retain Rule 14.5.23 as notified, subject to the amendments on Table 14(zc).	Support	OWL considers the decision sought by the submitter is appropriate and necessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be allowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.255	14.05.23A	Retain Rule 14.5.23A as notified, subject to the amendments on Table 14(zc).	Support	OWL considers the decision sought by the submitter is appropriate and necessary to achieve the relevant statutory tests for regional plan provisions.	That the submission point be allowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.256	14.05.24	Retain Rule 14.5.24 as notified.	Support	OWL considers the decision sought by the submitter is appropriate and necessary to achieve the relevant statutory tests for regional plan provisions, and would ensure alignment with current Canterbury Land and Water Plan provisions.	That the submission point be allowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.257	14.05.24A	Retain Rule 14.5.24A as notified.	Support	OWL considers the decision sought by the submitter is appropriate and necessary to achieve the relevant statutory tests for regional plan provisions and would ensure alignment with current Canterbury Land and Water Plan provisions.	That the submission point be allowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Royal Forest and Bird Protection Society Inc	PC7-472.192	14.05.24A	Amend Rule 14.5.24A to strengthen the activity status to a non-complying activity.	Oppose	OWL considers the decision sought by the submitter is unjustified and unnecessary to achieve the relevant statutory tests for regional plan provisions and would otherwise be inconsistent with current region-wide Canterbury Land and Water Plan provisions.	That the submission point be disallowed.
Combined Canterbury Provinces, Federated Farmers of New Zealand	PC7-430.258	14.05.25	Retain Rule 14.5.25 as notified.	Support	OWL considers the decision sought by the submitter is appropriate and necessary to achieve the relevant statutory tests for regional plan provisions and would ensure alignment with current Canterbury Land and Water Plan provisions.	That the submission point be allowed.
Timaru District Council	PC7-292.113	14.05.25A	Retain the intent of Rule 14.5.25A as notified.	Support	OWL considers the decision sought by the submitter is appropriate and necessary to achieve the relevant statutory tests for regional plan provisions and would ensure alignment with current Canterbury Land and Water Plan provisions.	That the submission point be allowed.
Royal Forest and Bird Protection Society Inc	PC7-472.194	14.05.29	Amend Rule 14.5.29 to insert matters of discretion.	Oppose	OWL supports the implications of the submission point, namely that the status of activities governed by Rule 14.5.29 be less stringent than proposed by PC7 (i.e. discretionary activity status be changed to restricted discretionary activity status). However, for the reasons outlined in OWL's primary submission on PC7, OWL considers that a controlled activity status is more appropriate.	That the submission point be disallowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.37	14.05.New	Insert a new rule as follows: <u>The taking and use of surface water from a catchment for use within another catchment is a non-complying activity</u>	Support	OWL supports the non-complying activity status of the submitter's proposed new rule. It does, however, query whether the rule is necessary in light of Policy 4.56 of the Canterbury Land and Water Regional Plan.	That the submission be allowed, subject to OWL's further submission.
Darby Farm Partnership Moffit Dairy Limited Orton Downs Farm Partnership	PC7-464.5 PC7-435.61 PC7-469.61	14.05.30	Retain Rule 14.5.30 as notified.	Oppose in part	In its primary submission on PC7, OWL has requested that the status of activities under Rule 14.5.30 be changed from prohibited to non-complying. OWL opposes the decision sought in the submission point to the extent that it is inconsistent with OWL's primary submission on Rule 14.05.30.	That the submission point be disallowed in relation to retention of prohibited activity status, and otherwise be allowed.
Richardson, J	PC7-65.38	14.06.02 Table 14(m)	Amend Table 14(m) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in OWL's primary submission on PC7, it considers that the environmental flows in Table 14(m) will achieve the statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan.	That the submission point be disallowed.
Fox Peak Station Limited	PC7-166.18	14.06.02.Table 14(m)	Amend Table 14(m) minimum flow for Deep Creek as follows: Minimum flow: 2600 as per resource consent conditions	Support	The decision sought be the submitter appears to be consistent with that sought by OWL in its primary submission on Table 14(m).	That the submission point be allowed.
Fox Peak Station Limited	PC7-166.19	14.06.02.Table 14(m)	Amend Table 14(m) allocation limit for Deep Creek as follows: Allocation Limit: 145 119.5 L/s	Support	The decision sought be the submitter appears to be consistent with that sought by OWL in its primary submission on Table 14(m).	That the submission point be allowed.

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	Submission point reference	Plan Change 7 (PC7) Provision				
Hay, A P	PC7-249.1	14.06.02.Table 14(m)	Amend Table 14(m) to remove 'AN Takes' from pro-rata calculations.	Support	The decision sought be the submitter appears to be consistent with that sought by OWL in its primary submission on the definition of “pro-rata”.	That the submission point be allowed
Fox Peak Station Limited	PC7-166.20	14.06.02.Table 14(n)	Amend Table 14(n) to include the following: Unnamed waterway: Minimum flow: as per resource consent conditions Partial Restrictions: - Pro Rata Allocation: 8.4 L/s	Support	The decision sought be the submitter appears to be consistent with that sought by OWL in its primary submission, i.e. that provision be made for the unnamed waterway.	That the submission point be allowed.
Richardson, J	PC7-65.39	14.06.02 Table 14(n)	Amend Table 14(n) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in OWL’s primary submission on PC7, it considers that the environmental flows in Table 14(n) will achieve the statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan.	That the submission point be disallowed.
Richardson, J	PC7-65.40	14.06.02 Table 14(o)	Amend Table 14(o) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in OWL’s primary submission on PC7, it considers that the environmental flows in Table 14(o) will achieve the statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan.	That the submission point be disallowed.
Mackenzie District Council	PC7-457.5	14.06.02.Table 14(o)	Amend Table 14(o) to require regimes that apply from 2030 to be considered through a separate plan change process, allowing for a thorough assessment of the effects of the	Support	The decision sought is consistent with OWL’s primary submission on PC7.	That the submission point be allowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
			first step before setting further reductions			
Richardson, J	PC7-65.41	14.06.02 Table 14(p)	Amend Table 14(p) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in OWL's primary submission on PC7, it considers that the environmental flows in Table 14(p) will achieve the statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan.	That the submission point be disallowed.
Mackenzie District Council	PC7-457.6	14.06.02.Table 14(q)	Amend Table 14(q) to require regimes that apply from 2030 to be considered through a separate plan change process, allowing for a thorough assessment of the effects of the first step before setting further reductions.	Support	The decision sought is consistent with OWL's primary submission on PC7.	That the submission point be allowed.
Richardson, J	PC7-65.42	14.06.02 Table 14(q)	Amend Table 14(q) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in the its primary submission on PC7, OWL considers that Table 14(p) should be deleted. OWL therefore opposes the submission point.	That the submission point be disallowed.
Richardson, J	PC7-65.43	14.06.02 Table 14(r)	Amend Table 14(r) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in OWL's primary submission on PC7, it considers that the environmental flows in Table 14(r) will achieve the statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan.	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Mackenzie District Council	PC7-457.7	14.06.02.Table 14(s)	Require regimes that apply from 2030 to be considered through a separate plan change process, allowing for a thorough assessment of the effects of the first step before setting further reductions.	Support	While OWL's primary submission on PC7 sought that Table 14(s) be amended to require the regime applying in the Te Ana Wai River from 2030 to take effect from 2035, OWL supports the decision sought in the submission point as an alternative to the relief sought in its primary submission.	That the submission point be allowed.
Richardson, J	PC7-65.44	14.06.02 Table 14(s)	Amend Table 14(s) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	For the reasons set out in the its primary submission on PC7, OWL considers that the environmental flows in Table 14(s) will achieve the statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan. OWL therefore opposes the submission point.	That the submission point be disallowed.
Department of Conservation	PC7-160.96	14.06.02.Table 14(v)	Amend Table 14(v) to increase the Jan-Feb minimum flows for the Opihi River at the Saleyards Bridge to provide for enhanced instream habitat values.	Oppose in part	<p>OWL supports the submitter's request that the minimum flows for the mainstem of the Opihi River at Saleyards Bridge be increased during January and February as this aligns with the decisions sought by OWL in its primary submission on PC7.</p> <p>For completeness, OWL notes that the submission point also records the submitter's position that:</p> <ul style="list-style-type: none"> the triggers proposed by the AMWG would keep the lower Opihi River in level 1 and 2 restriction minimum flows for extended periods in most years on record; and 	<p>To the extent that the submission point seeks to increase the Table 14(v) Jan-Feb minimum flows for the Opihi River, that the submission point be allowed.</p> <p>In all other respects, that the submission point be disallowed.</p>

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
					<ul style="list-style-type: none"> PC7's volumetric irrigation restrictions appear easier to implement and monitor. <p>For the reasons set out in full in OWL's primary submission, OWL strongly oppose those aspects of the PC7, and consequently oppose the submission point to the extent that it supports them.</p>	
Richardson, J	PC7-65.46	14.06.02.Table 14(u)	Amend Table 14(u) minimum flow figures to those that are more realistic and might make a practical difference	Oppose	The decision sought by the submitter is inconsistent with that sought be OWL in its primary submission on Table 14(u).	That the submission point be disallowed.
Richardson, J	PC7-65.47	14.06.02 Table 14(v)	Amend Table 14(v) minimum flow figures to those that are more realistic and might make a practical difference.	Oppose	<p>In its primary submission on PC7, OWL has sought amendments to the environmental flows in Table 14(v) that it considers are required to achieve the relevant statutory tests, including implementation of the objectives and policies of the Canterbury Land and Water Regional Plan.</p> <p>OWL therefore opposes the submission point to the extent that the decision sought may result in changes to Table 14(v) that are inconsistent with the decisions sought in OWL's primary submission on PC7.</p>	That the submission point be disallowed.
Richardson, J	PC7-65.48	14.06.02.Table 14(w)	Amend Table 14(w) minimum flow figures to those that are	Oppose	In its primary submission on PC7, OWL has sought deletion of Table 14(w) as it considers the underlying scientific basis for the proposed "full availability" environmental flows to be	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
			more realistic and might make a practical difference.		fundamentally flawed. OWL therefore opposes the submission point.	
Mackenzie District Council	PC7-457.8	14.06.02.Table 14(w)	Require regimes that apply from 2030 to be considered through a separate plan change process, allowing for a thorough assessment of the effects of the first step before setting further reductions.	Support	The decision sought is consistent with OWL's submission that Table 14(w) be deleted.	That the submission point be allowed.
Fox Peak Station Limited	PC7-166.21	14.06.02.Table 14(y)	Amend Table 14(y) to include additional row for Station Stream as follows: <u>Station Stream;</u> <u>Station Stream at Gorge;</u> <u>minimum flow - as per resource consent conditions;</u> <u>Allocation - as per existing resource consents</u>	Support	OWL considers it appropriate that all existing BN allocation be reflected in Table 14(y).	That the submission point be allowed.
Fox Peak Station Limited	PC7-166.22	14.06.02.Table 14(y)	Amend Table 14(y) to include new row for Deep Stream as follows: <u>Deep Stream;</u> <u>Minimum flow - as per existing resource consent conditions;</u> <u>Allocation - as per existing resource consents</u>	Support	OWL considers it appropriate that all existing BN allocation be reflected in Table 14(y).	That the submission point be allowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
Fonterra Co-operative Group Limited	PC7-416.3	14.06.03.Table 14(zb)	Amend Table 14(zb) to refine the allocation limits for the Orari-Opihi Zone so there is certainty regarding the appropriateness of those limits, and clarify why no changes were made to the maximum allocation for the Orari-Opihi GAZ to correspond with the apparent changes to its boundaries. Additionally, if Policy 14.4.7 is not amended to more accurately reflect Table 14(zb), amend Table 14(zb) to reflect Policy 14.4.7.	Support	OWL considers the decision sought by the submitter to be an appropriate alternative to that sought in its primary submission on Table 14(zb).	That the submission point be allowed.
DairyNZ Limited	PC7-357.76	14.06.04.Table 14(zc)	Amend Table 14(zc) to insert the following note: If the ground water quality targets in Table 14(g) are achieved by either 1 January 2030 or 1 January 2040, the percentage reductions required by Table 14(zc) do not need to be met by farming activities.	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.196	14.06.04.Table 14(zc)	Amend Table 14(zc) to require further and faster reductions.	Oppose	OWL is concerned about the economic implications for farmers and the wider community if the decision sought by the submitter was to be allowed. In OWL's view, that decision is not	That the submission point be disallowed.

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	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
					necessary or appropriate to achieve the relevant statutory tests for regional plan provisions.	
DairyNZ Limited	PC7-357.43	16.07	Retain the insertion of 'springs' under 'Management Area' in Schedule 7.	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.
DairyNZ Limited	PC7-357.45	16.07	Retain objectives and targets under Section 11 'Orari-Temuka-Opihi-Pareora - Additional Requirements' of Schedule 7 subject to any consequential amendments sought for Table 14(zc).	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.39	16.07	Retain Schedule 7, Part B, 2(a) as notified.	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.42	16.07	Retain Schedule 7, Part B, 11 (Orari-Temuka-Opihi-Pareora Additional Requirements), Management Area 3 (Mahinga Kai) as notified.	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.
Department of Conservation	PC7-160.35	16.07	Amend Schedule 7 to require a staged reduction of water quality contaminants where the	Oppose	OWL is concerned that the decision sought by the submitter may have unintended consequences for artificial lakes, such as the Opuha Dam.	That the submission point be allowed

(1) Name of person who made primary submission that is supported or opposed	(2) The particular parts of the primary submission supported or opposed		(3) Primary Submission	(4) Support/ Oppose	(5) Reasons for support or opposition of the primary submission	(6) Decision sought
	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
			sensitive lakes are not achieving their TLI outcomes.			insofar as it relates to sensitive lakes only.
Water and Wildlife Habitat Trust	PC7-88.33	16.07	Amend Schedule 7 to require farm environment plans to map land drainage/overland flow paths and connecting wetlands and plan stock exclusion and native revegetation.	Oppose	OWL is concerned about the cost and resourcing availability to provide the information suggested by the submitter and its overall relevance.	That the submission point be disallowed.
Water and Wildlife Habitat Trust	PC7-88.47	16.07	Amend Schedule 7 to require more detailed on-farm overland stormwater flow/drainage mapping.	Oppose	OWL is concerned about the cost and resourcing availability to provide the information suggested by the submitter and its overall relevance.	That the submission point be disallowed.
Iles, H	PC7-310.23	16.07	Amend Schedule 7 to clarify communication and monitoring systems for auditing FEPs.	Oppose	The decision sought is unclear, and consequently it is not possible to assess the implications for FEP holders.	That the submission point be disallowed.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	PC7-424.40	16.07	Amend Schedule 7, Part B, 5E as follows: 5E Management Area: Waterbodies (wetlands, riparian areas, drains, rivers, lakes, springs) Objective: Wetlands, riparian areas, <u>springs</u> and the margins of surface water bodies are managed to avoid damage to the bed and margins of the water body, and to avoid the direct input of nutrients,	Support	OWL considers the decision sought to be appropriate and necessary.	That the submission point be allowed.

(1) Name of person who made primary submission that is supported or opposed	(2) The particular parts of the primary submission supported or opposed		(3) Primary Submission	(4) Support/ Oppose	(5) Reasons for support or opposition of the primary submission	(6) Decision sought
	<i>Submission point reference</i>	<i>Plan Change 7 (PC7) Provision</i>				
			sediment, and microbial pathogens.			
Water and Wildlife Habitat Trust	PC7-88.55, 72, 74 - 93	16.07	Various changes as outlined in the submission	Oppose	OWL is concerned about the cost and resourcing availability to provide the information suggested by the submitter and its overall relevance.	That the submission point be disallowed.
Royal Forest & Bird Protection Society Inc	PC7-472.210 - 215	16.07	Various changes as outlined in the submission	Oppose	OWL is concerned about the cost and resourcing availability to provide the information suggested by the submitter and its overall relevance.	That the submission point be disallowed.

ANNEXURE B: PRIMARY SUBMITTER ADDRESSES

Submitter ID	Primary Submitter name	Address	Email
385	Adaptive Management Working Group	c/- Gresson Dorman & Co PO Box 244 Timaru 7940	georgina@gressons.co.nz
382	Opihi Flow and Allocation Working Party	c/- Gresson Dorman & Co PO Box 244 Timaru 7940	georgina@gressons.co.nz
551	Orari River Protection Group	243 Talbot Street Geraldine 7930	adelecoombs@y7mail.com
109	Brown, A	34 Thatcher Road RD1 Geraldine 7991	drewsallybrown@gmail.com
377	Westburn Farm Limited	1760 Cust Road RD1 Rangiora 7471	sandsfraser@xtra.co.nz
473	Spencer-Bower, M J	The Homestead Claxby RD6 Rangiora 7476	claxby@xtra.co.nz
88	Water and Wildlife Habitat Trust	61 Andover St Merivale 8014	dandmpatchett@xtra.co.nz
348	Future Rivers	6587 Rakaia Gorge Arunden Road RD12 Rakaia	steve@futerivers.co.nz; steve.gerard@xtra.co.nz
542	New Zealand Salmon Anglers Association	2 Ruru Road Bromly Christchurch	the-burkes@outlook.com
472	Royal Forest & Bird Protection Society Inc.	PO Box 2516 Christchurch 8140	n.snoyink@forestandbird.org.nz
424	Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	C/- Aoraki Environmental Consultancy Ltd	kyliehall@aecltd.co.nz
316	Rangitata Dairies Limited Partnership	907 Arundel Rangitata Road RD22 Geraldine 7992 office@wilfarm.co.nz	office@wilfarm.co.nz
554	Adams, M	51 Tondros Road RD17 Fairlie	mark.rocklands@gmail.com
237	Wainono Dairy Ltd	PO Box 56 Fairlie 7987	richard@greenvale.co.nz

Submitter ID	Primary Submitter name	Address	Email
238	Upper Opihi-Opuha Catchment Group	41 Middle Valley Rd RD17 Fairlie 7987	jarowfarming@gmail.com
221	Biggs Agriculture Ltd	Ashley and Rebecca Biggs 33 Hamilton Road RD17 Fairlie 7987	biggsag@yahoo.co.nz
138	Canterbury Aoraki Conservation Board	Private Bag 4715 Christchurch Mail Centre Christchurch 8140	canterburyaorakiboard@doc.govt.nz
457	Mackenzie District Council		planning@mackenzie.govt.nz
541	Newton, J	172A North Street West End Timaru 7910	jackiekiche@hotmail.com
85	Neave, R	PO Box 17727 Sumner 8840	rosemary@womentravel.co.nz
310	Iles, H		inthehills@ezykonec.co.nz
72	Midgley, A	Willowbrook RD Timaru 7972	alastairbv@gmail.com
94	Barnes Family Farms Limited	172 Highbank School Road; 34 Chichester Street Christchurch	gayleneabarnes@gmail.com
128	Black, L		lewis.black.94@gmail.com
320	Bebbington, C		charlotte.bebbington@gmail.com
461	Barnes, J		jacqui.m.barnes@gmail.com
147	Michael, S		smicha21@hotmail.com
321	Christensen, C	5 Aldgate Street Redwood Christchurch	connievince@yahoo.com
163	Cockburn, A;		andy.cockburn@gmail.com
164	Campbell, S		sarasski@hotmail.com
241	Curtis, D		daniel.curtis@windowslive.com
395	Jacobs, S		sam.jacobs.nz@gmail.com
93	Gallagher, K		doygalpress@yahoo.com
215	Dalziel, J		jdalziel@snap.net.nz

Submitter ID	Primary Submitter name	Address	Email
258	Dopleach, D		dana@bluefusion.co.nz
83	Frankland, R		rlfrlrf@hotmail.com
366	McNab, R		richiemcnab@hotmail.com
77	Oldham, J		stuartandjodi@xtra.co.nz
250	McInnes, S		sophiesmailbox@gmail.com
124	List, B	c/- Plant & Food Research Private Bag 4704 Christchurch Mail Centre Christchurch 8140	Blake.List@plantandfood.co.nz; bwl25@uclive.ac.nz; blake.w.list@gmail.com
466	Hailstone, S	26 Beveridge Street Christchurch 8013	sheila.hailstone@xtra.co.nz
106	Cotter, J	31 Blake St New Brighton Christchurch 8061	southernzephyr@gmail.com
463	Currie, M	32 Howe Street Christchurch 8083	currance@xtra.co.nz
256	De Lu, K	75 Greendale Ave Avonhead Christchurch 8042	katiadelu@gmail.com
268	Baird, M	75 Greendale Ave Avonhead Christchurch 8042	mbairdnz@gmail.com
261	Downard, J		angulijulie@gmail.com
99	Low, C		cafelow@gmail.com
398	Perriam, E		emmaworters@gmail.com
119	Reiner, W		will.reiner1@gmail.com
388	Ridden-Harper, A	157 Levi Road Rolleston 7914	ar-h1991@hotmail.com
116	Robertson, J		emailjackr@gmail.com
78	Ross, M J	119 Chapter Street St Albans Christchurch	jane@mjaneross.com
81	Tie, M A		stignz1@gmail.com
80	Zhang, F		francescazhang64@gmail.com
123	Evans, D J	7 Manatu Lane Waltham Christchurch 8023	dave.evansii@gmail.com

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Submitter ID	Primary Submitter name	Address	Email
7	Campbell, A	66 Rocky Hundreds Road RD2 Timaru 7972	allancampbell.thehill@yahoo.com
210	Tronnoco Farming Co Ltd	99 Hides Road Seadown RD3 Timaru 7973	tronnoco99@gmail.com
354	O'Kane, K & K	159 Hides Road Seadown RD3 Timaru 7973	kandkokane@xtra.co.nz
134	Oldfield, M E;	768 Seadown Road Seadown RD3 Timaru 7973	me.oldfield@gmail.com
375	Waipopo Farm Limited	329 Waipopo Road Seadown Timaru	waipopo-zoo@xtra.co.nz
284	Cotter, D & D	225 Connolly Road Seadown RD3 Timaru 7973	dee.doug@farmside.co.nz
120	Belpher Farm Ltd	472 Levels Plain Rd Timaru	gaffaney@farmside.co.nz
364	Phillips Farming Ltd	646 Seadown Road RD3 Timaru 7973	julway@farmside.co.nz
253	Seaforth Farm Ltd	106 Seaforth Settlement Road RD3 Timaru 7973	seaforthfarm@gmail.com
331	Heritage New Zealand Pouhere Taonga	PO Box 4403 Christchurch	jtrewin@heritage.org.nz
209	Aotearoa Water Action		aotearoawateraction@gmail.com
430	Combined Canterbury Provinces, Federated Farmers of New Zealand	PO Box 414 Ashburton 7740	lhume@fedfarm.org.nz
357	DairyNZ Limited	PO Box 85066 Lincoln University Canterbury 7647	charlotte.wright@dairynz.co.nz
160	Department of Conservation	Private Bag 4715 Christchurch Mail Centre 8140	gdeavoll@doc.govt.nz
166	Fox Peak Station Limited	C/- Irricon Resource Solutions PO Box 2193 Timaru	haidee@irricon.co.nz
416	Fonterra Co-operative Group Limited	C/- Chapman Tripp PO Box 2510 Christchurch 8140	ben.williams@chapmantripp.com

Submitter ID	Primary Submitter name	Address	Email
292	Timaru District Council	PO Box 522 Timaru 7940	kate.walkinshaw@timdc.govt.nz
464	Darby Farm Partnership	Unit 5 20 Hampton Downs Road RD2 Tekauwhata 3782	devethgroup@gmail.com
435	Moffit Dairy Limited	208 Havelock Street Ashburton 7700	jtmoffitt@farmside.co.nz
469	Orton Downs Farm Partnership	Unit 5 20 Hampton Downs Road RD2 Tekauwhata 3782	devethgroup@gmail.com
65	Richardson, J	34 Adian Way Loburn Rangiora 7472	richardsonj162@gmail.com
249	Hay, A P	1614 Clayton Rd Fairlie 7987	sherwoodhays@gmail.com