

**From:** [Suzette Bouwer](#) on behalf of [Ben Williams](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** "[charlotte@agrimagic.co.nz](#)"; [Lauren Phillips](#); [Peter Kingsbury](#); [Lionel Hume](#); [Charlotte Wright](#); [Rachel Robilliard](#); "[rcosgrove@fishandgame.org.nz](#)"; "[john@bcewater.co.nz](#)"; "[johanna.king@tp.co.nz](#)"; "[carmen@planzconsultants.co.nz](#)"; "[n.snoyink@forestandbird.org.nz](#)"; [kyliehall@aectd.co.nz](#); "[haidee@irricon.co.nz](#)"; "[geoff.meadows@wmk.govt.nz](#)"  
**Subject:** Plan Change 7 LWRP Further Submission  
**Date:** Friday, 6 December 2019 3:44:14 PM

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Kia ora,

Please find **attached** for filing, and by way of service, the further submission of **DAIRY HOLDINGS LIMITED** on proposed Plan Change 7 to the Canterbury Land and Water Regional Plan.

Nga mihi,  
Ben

BEN WILLIAMS

PARTNER

**CHAPMAN TRIPP**

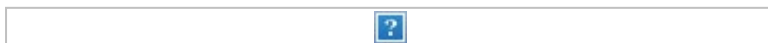
D: +64 3 353 0343

M: +64 27 469 7132

F: +64 3 365 4587

LEGAL ADMINISTRATOR: Suzette Bouwer | D: +64 3 353 0396

[www.chapmantripp.com](http://www.chapmantripp.com)



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**FURTHER SUBMISSION ON PLAN CHANGE 7 TO THE CANTERBURY LAND & WATER REGIONAL PLAN**

*Clause 8 of Schedule 1, Resource Management Act 1991*

**To** Canterbury Regional Council

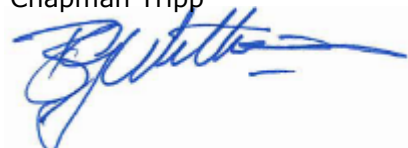
[mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz) (subject: "Plan Change 7 LWRP Further Submission")

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

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

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

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



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Ben Williams  
Partner  
6 December 2019

Address for service of submitter:

Dairy Holdings Limited  
c/- Ben Williams / Rachel Robilliard  
Chapman Tripp  
5th Floor, PwC Centre  
60 Cashel Street  
PO Box 2510  
Christchurch 8140  
Email address: ben.williams@chapmantripp.com / rachel.robilliard@chapmantripp.com

## Annexure 1 – DHL Further submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
Nitrate-Reductions PC7-337.142	Christchurch City Council	Oppose	DHL does not support proposed reduction targets being increased and brought forward.	Reject the submission
Nitrate-Reductions PC7-131.14	Agri Magic Limited	Support	DHL agrees that nitrate reductions for mixed farming enterprises are unclear.	Accept the submission
General Seeking Amendment PC7-235.30	Rangitata South Irrigation Limited	Support	DHL support the inclusion of definitions, policies and rules that enable the formation of nutrient user groups within the OTOZ zone.	Accept the submission
08.04.04 PC7-114.66	Ravensdown Limited	Support	DHL supports the amendments proposed in relation to Policy 8.4.4 and considers they better reflect the range of outcomes contemplated across the Plan Change 7 area.	Accept the submission
08.04.22 PC7-3.11	Waimakariri District Council	Support	DHL supports the minor amendment proposed to clarify the waterbodies to which the policy applies.	Accept the submission
08.04.22 PC7-357.14	Dairy NZ Limited	Support	The amendment proposed clarifies how efficiency is to be approached in light of potentially conflicting plan provisions, which is supported.	Accept the submission
08.04.26 PC7-430.89	Combined Canterbury Provinces, Federated	Support	DHL supports the granting of resource consent to exceed Baseline GMP Loss Rates where the circumstances in the policy are met. Consistent with DHL's original submission, this needs to be subject to changes also being sought in relation to Table 8-9.	Accept the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
	Farmers of New Zealand			
08.04.28B PC7-357.20	Dairy NZ Limited	Support	DHL supports the deletion of " <i>limited circumstances</i> " from the policy (and otherwise supports the policy). Application of the policy should be clear and the words " <i>limited circumstances</i> " do not assist with that.	Accept the submission
08.04.28C PC7-95.21	North Canterbury Fish and Game Council	Oppose	The proposal for the immediate replacement of an Equivalent Good Management Practice Loss Rate when the Farm Portal is able to generate a Baseline or GMP Loss Rate is inappropriate and unworkable in terms of the actual implications of that replacement.	Reject the submission
08.04 New Policy PC7-214.81 PC7-214.82	Beef + Lamb New Zealand	Support in part	DHL supports in principle a policy and rule framework that enables the establishment of nutrient user groups in the same catchment. However, DHL is concerned that the proposal to preclude grandparenting for nutrient allocation fails to recognise the existing investment in properties such as dairy farms that may have higher nutrient allocation.	Accept the submission, subject to amendments outlined
08.05.12 PC7-179.3  08.05.14 PC7-179.50	Larundel Dairy Partnership	Support	The relationship between Rules 8.5.12 and 8.5.14 is not clear. DHL agrees that there is a need to clarify the relationship between the rules to ensure they are workable.	Accept the submission
08.5.21 PC7-357.34	Dairy NZ Limited	Support	DHL supports the retention of Rule 8.5.21 as a permitted activity and agrees with the need to also take into account the amendments to Table 8-9.	Accept the submission
08.05.22 PC7-114.81	Ravensdown Limited	Support	DHL supports the retention of Rule 8.5.22, subject to the amendment that seeks a wider reference to nitrogen reductions (rather than just those contemplated by Table 8-9). DHL supports the general approach of pro-rata managing nutrient losses across properties that	Accept the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
			are only partially within the Nitrate Priority Area (subject to DHL's submissions elsewhere that the Nitrate Priority Area be deleted).	
08.05.23 PC7-114.82	Ravensdown Limited	Support	Given DHL's sought relief in relation to removing the Nitrate Priority Sub-Areas from Table 8-9 and elsewhere, DHL supports the deletion of this rule.	Accept the submission
08.05.30A PC7-114.94	Ravensdown Limited	Support	In light of the strong policy direction, DHL agrees it is unnecessary to additionally include Rule 8.5.30A.	Accept the submission
08.06.Table 8a PC7-357.36  08.06.Table 8a PC7-357.69, 70, 71  08.06.Table 8b PC7-357.39  08.07.Table 8- 5 PC7-357.38  08.07.Table 8- 6 PC7-357.37  08.07.Table 8- 7 PC7-357.40	Dairy NZ Limited	Support	DHL supports the adoption of Tables 8a, 8b and 8-5 to 8-8 subject to the amendments proposed by the submitter.	Accept the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
08.07.Table 8-8 PC7-357.41				
08.07.Table 8-9 PC7-337.107  08.07.Table 8-9 PC7-337.168	Christchurch City Council	Oppose	DHL opposes further changes to Table 8-9 (that would see reductions applying earlier and to a greater extent). DHL seeks the changes to Table 8-9 as set out in its original submission.	Reject the submission
08.07.Table 8-9 PC7-95.102	North Canterbury Fish and Game Council	Oppose	DHL opposes further changes to Table 8-9 (that would see reductions applying earlier). DHL seeks the changes to Table 8-9 as set out in its original submission.	Reject the submission
14.04.18 – 14.04.19 PC7-278.68	Royal Forest & Bird Protection Society	Oppose	DHL opposes a requirement for reductions in high nitrogen concentration areas to increase over time, particularly as consents for reductions beyond GMP baseline are only to be granted for 10 years.	Reject the submission
14.04.19 PC7-114.36	Ravensdown Limited	Support	DHL supports in principle the proposed amendments to (a) in the Policy.	Accept the submission
14.04.19 PC7-357.74  PC7-357.49  PC7.357.73	DairyNZ Limited	Support	DHL supports in principle the proposed amendments to the Policy.	Accept the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
14.04.20A PC7-357.52 PC7-357.75	DairyNZ Limited	Support	DHL supports in principle the proposed amendments to the policy.	Accept the submission
14.04.20B	DairyNZ Limited	Support	DHL supports in principle the proposed amendment to the policy.	Accept the submission
14.04.21 PC7-318.39	Temuka Catchment Working Party	Support in part	DHL agrees that the term 'immediately' in the policy is inappropriate and a period of time should be specified, which DHL considers should be set as five years from when the provision becomes operative.	Accept the submission, subject to the amendment outlined
14.04.22 PC7-424.7	Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu	Oppose	DHL opposes policy direction that all abstractors must demonstrate increased efficiency, as the amendment would extend the policy too broadly to be consistent with the original intent of the policy.	Reject the submission
14.04 New PC7-214.122	Beef + Lamb New Zealand	Support in part	DHL supports in principle a policy and rule framework that enables the establishment of nutrient user groups in the same catchment. However, DHL is concerned that the proposal to preclude grandparenting for nutrient allocation fails to recognise the existing investment in properties such as dairy farms that may have higher nutrient allocation.	Accept the submission, subject to the amendment outlined
14.05.07 PC7-318.70	Temuka Catchment Working Party	Support	DHL agrees that Rule 14.5.7 (and T allocation) should be available to abstractors that substitute high and moderate stream depleting takes with deep groundwater takes.	Accept the submission
14.05.07- 14.05.11 PC7-472.185 PC7-472.186 PC7-472.187	Royal Forest & Bird Protection Society	Oppose	Potential adverse effects on groundwater indigenous biodiversity is not practicable, given the absence of knowledge about stygofauna.	Reject the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
PC7-472.188 PC7-472.189				
14.05.15 PC7-114.43	Ravensdown Limited	Support	DHL supports the retention of Rule 14.05.15, subject to the amendment that seeks a wider reference to nitrogen reductions (rather than just those contemplated by Table 14(zc)). DHL supports the general approach of pro-rata managing nutrient losses across properties that are only partially within the High Nitrogen Concentration Area (subject to DHL's submissions elsewhere that the boundary of the High Nitrogen Concentration Area is amended to follow the existing green zone near the Rangitata River).	Accept the submission
Table 14(zb) PC7-318.61	Temuka Catchment Working Party	Support	The volumes proposed appear to appropriately reflect existing take and use.	Accept the submission