

From: [Waimak NGF](#)
To: [Mailroom Mailbox](#)
Cc: Plan Change 7 LWRP Further Submission, WNGFT
Friday, 6 December 2019 3:04:39 PM

Subject:
Date:
Attachments:

Hello

Please find attached the Waimakariri Next Generation Farmers Trust "further submission" on Plan Change 7 of the LWRP.

Regards, WNGF Trustees

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

TO: Canterbury Regional Council
PO Box 345, Christchurch 8140

BY EMAIL: mailroom@ecan.govt.nz

FURTHER SUBMISSION TO: **Proposed Plan Change 7 to the operative Canterbury Land and Water Regional Plan**

NAME OF SUBMITTER: Waimakariri Next Generation Farmers Trust

ADDRESS FOR SERVICE: C/- Prosser Quirke, PO Box 4, Rangiora
waimak.ngf@gmail.com

Thank you for giving the Waimakariri Next Generation Farmers Trust¹ the opportunity to lodge further submissions to the principal submissions that were lodged by other parties to proposed Plan Change 7² to the Canterbury Land and Water Regional Plan³.

The NGF lodged its principal submissions to PC7 on the 13th of September 2019. As is apparent from its principal submission, the Trust has an interest in the various provisions and submission points that is greater than that of the general public.

The NGF wishes to be heard in support of its submissions and further submissions. If others make similar submissions, the NGF would consider presenting a joint case with them at any hearing.

The NGF cannot gain an advantage in trade competition through these further submissions.

The NGF's further submissions and the reasons for the same are set out within the attached table, entitled '*NGF Further Submissions to PC7 to the CLWRP*'.

Signed for and on behalf of the NGF by



Date: 6th of December 2019

Sam Spencer-Bower

Secretary of the Waimakariri Next Generation Farmers Trust

¹ Hereafter referred to as 'the NGF' or 'the Trust'

² Hereafter referred to as 'PC7'

³ Hereafter referred to as 'the CLWRP'

Table 1: NGF Further Submissions to PC7 to the CLWRP

Submitter Name	Submission Number	PC7 Provision	Submission	Support / Oppose Submission	Reasons	Relief Sought
Christchurch City Council	PC7-337.147	General Seeking Amendment	The submitter notes that the effects of climate change do not appear to feature in the current CLWRP and that PC7 does not appear to have taken climate change into account. They consider that it is appropriate and necessary that Environment Canterbury to review PC7 in line with projected climate change effects, including lower river levels, higher sea levels and increased groundwater levels; and that the regional council make appropriate changes to the objectives, policies and rules.	Oppose	<p>The NGF understands that the potential effects of climate change have been factored into the modelling informing the policies and rules in PC7. If the effects that result over time differ from the assumptions and attributes adopted in the modelling, then the regional council is able to review the provisions in the plan accordingly.</p> <p>The NGF does not support reviewing PC7 in such a fundamental way at this point in the plan making process as this will delay the improvements in the management of land and water that the community is seeking.</p> <p>The NGF considers that any predictions on climate change are not certain, and that when things are not certain, adaptive management is key to sound management of the environment and related natural resources.</p>	Reject submission
Christchurch City Council	PC7-337.5	Section 2.9 - Definitions	<p>The submitter seeks that a definition of “<i>non-consumptive use</i>” be added as follows:</p> <p><i>“Non-consumptive use means the taking or use of water that results in a neutral water balance within the wider hydrological system and/or aquifer.”</i></p>	Support	The NGF agrees that a definition on “ <i>non-consumptive use</i> ” would improve clarity when determining which takes, or part thereof, are subject to allocation limits; and they note that takes that transfer water within a hydrological system (such as from groundwater to surface water or vice versa) can have benefits to the environment.	Accept submission

<p>North Canterbury Province, Federated Farmers of New Zealand</p>	<p>PC7-430.4</p>	<p>Section 2.9 - Definitions Definition of “Indigenous Freshwater Species Habitat”</p>	<p>The submitter opposes adoption of the definition of “<i>Indigenous Freshwater Species Habitat</i>” in its current form. Before the definition is adopted, they seek analysis and discussion on “<i>what is intended to be captured, the value of these habitats, how they will be mapped and within what timeframes, who is resourcing or funding the assessments, how widespread they are likely to become, what areas will be covered by them and what the impacts will be, especially economic impacts.</i>”</p> <p>The submitter considers that “<i>indigenous freshwater species are ubiquitous, so Indigenous freshwater species habitat, taken to its logical extreme, could encompass all freshwater in the Canterbury Region.</i>”</p>	<p>Support in part</p>	<p>If an area is identified on the planning maps as an area of “Indigenous Freshwater Species Habitat”, and provides habitat for at least one of the 11 species listed in the definition, then PC7 places heightened controls on activities in these areas. Accordingly, it is critical that the planning maps are well tested.</p> <p>The NGF requests that Ecan adopt a robust programme of work to ground truth the mapped areas of “Indigenous Freshwater Species Habitat”, clarify the attributes of importance that warrant regulated ‘protection’, and avoid potential capture of all freshwater bodies in Canterbury under this definition.</p> <p>Further to this, the NGF seeks adoption of a quick and efficient pathway for amending the planning maps when it can be demonstrated that a mapped area of “Indigenous Freshwater Species Habitat” is not an area of indigenous freshwater species habitat.</p>	<p>Accept submission, while also ensuring that there is a quick and efficient pathway for amending the planning maps when it can be demonstrated that a mapped area of “Indigenous Freshwater Species Habitat” is not an area of indigenous freshwater species habitat.</p>
<p>Christchurch City Council</p>	<p>PC7-337.84 PC7-337.85 PC7-337.86</p>	<p>Rules 5.191 to 5.193</p>	<p>The submitter seeks that these rules be amended to:</p> <ul style="list-style-type: none"> a) be consistent with the definition of MAR and thereby to provide for other freshwater to be used, and b) to provide for targeted stream augmentation in a manner similar to Rules 8.5.18, 8.5.19 and 8.5.20 in PC7. 	<p>Support</p>	<p>Rules 5.191 to 5.193 are limited to the take and use of surface water for managed aquifer recharge. It is possible that other sources of water could be used (such as groundwater from another aquifer). Such takes and use should also be provided for, subject to the conditions being complied with.</p> <p>Further to managed aquifer recharge, similar provision should also be provided for targeted steam augmentation.</p>	<p>Accept submission</p>

Ngā Rūnanga ⁴	PC7-423.38	Rule 5.62	The submitter seeks deletion of that part of the rule that provides for an application for resource consent under this rule to be processed and considered without public or limited notification.	Oppose	<p>The NGF is concerned that the change sought by the submitter will result in individual farmers seeking an individual consent to discharge nutrients rather than the irrigation schemes.</p> <p>This would take away the benefits gained by irrigation schemes overseeing the application process and monitoring of compliance with the consent. The schemes currently play a valuable role in ensuring that good information is provided to the council, and that farmers are complying with the conditions of consent. The incentive to comply with the consents held by the schemes is high, as the consequence of non-compliance can be not having access to scheme water.</p> <p>Further to this, the proposed non-notification (as notified) is only in the situation where the nutrient loss is equal to or less than that which is currently authorised, or is equal to the aggregation of the nutrient baseline across properties within the command area. The proposed non-notification does not apply to ‘new’ nutrient losses.</p>	Reject submission
North Canterbury Province, Federated Farmers of New Zealand	PC7-430.69	Section 8 Waimakariri	<p>The submitter seeks an amendment to the Zone Committee outcomes (pages 57 and 58 of PC7), as follows:</p> <p><i>“... a proportion of recharge to the deep aquifer system <u>beneath Belfast and North Christchurch</u> is likely to be derived from an area</i></p>	Support in part	The NGF supports the clarification sought by the submitter, but recognises that this may not have been the specific wording of the outcome identified by the Zone Committee. Accordingly, the clarification may need to be provided for in a different manner in the introduction of Section 8.	Section 8 introductory paragraphs be amended to clarify that it is the deep aquifer system beneath Belfast and North

⁴ Ngā Rūnanga is the collective term for Te Rūnanga o Ngāi Tahu and Te Rūnanga o Kaikōura, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki

			<i>within the Waimakariri sub-region.”</i>			Christchurch that is likely to be derived from an area within the Waimakariri sub-region.
Bowden Environmental	PC7-84.3	Section 8, Waimakariri, Northern Waimakariri Tributaries Freshwater Management Unit (page 59)	The submitter seeks that the description for the Eyre River be rewritten.	Support	The Eyre River headwaters are to the west and south of Oxford. The Eyre River is dry for most of the year and over most of its course. The incorrect description appears to inform policies that classify the Eyre River as a natural state waterbody, and this is not correct.	Accept submission
Bowden Environmental	PC7-84.5	Policy 8.4.5	The submitter seeks to remove the classification of the Eyre River as a Natural State Water Bodies	Support	The Eyre River is not a natural state waterbody.	Accept submission
Waimakariri District Council	PC7-3.10	Policy 8.4.5	The submitter seeks to remove the classification of View Hill Stream and the Eyre River as Natural State Water Bodies	Support	The View Hill Stream and the Eyre River are not natural state waterbodies.	Accept submission
North Canterbury Fish and Game	PC7-95.14	Policy 8.4.18	The submitter seeks that Policy 8.4.18 limit the transfer and associated surrender of water to 50% of “ <i>actual use</i> ” rate of take or “ <i>actual use</i> ” volume of water, determined as the average over the last 5 years.	Oppose	It is important that farmers are able to make informed long-term investment decisions, and access to water is key to such decisions. Farming is not a static operation, and not using the full consented allocation of water over a five-year period does not mean that the farmer has no intention or need to use the allocated water in the future. As notified, the policy is unclear whether the consented but ‘unused’ volume of water can be used by the consent holder after the transfer (and associated surrender) of a ‘used’ volume of water.	Reject submission

Christchurch City Council	PC7-337.88	Policy 8.4.19	The submitter seeks provision for Targeted Stream Augmentation from groundwater as a non-consumptive take, or the addition of provision for Targeted Stream Augmentation to the groundwater allocation tables.	Support	Targeted Stream Augmentation from groundwater is an important water management option that needs to be provided for within PC7.	Accept submission
North Canterbury Province, Federated Farmers of New Zealand	PC7-430.87	Policy 8.4.25(a)	The submitter seeks the following: c) Delete part a. of Policy 8.4.25, or amend to adopt the Plan Change 5 winter grazing thresholds.	Support	The NGF considers that additional constraints on winter grazing, beyond those already imposed through Plan Change 5 are not justified. The NGF understands that there is no evidence to support the claim in the Waimakariri Zone Implementation Programme Addendum (page 15) that the “Permitted activity rules in Plan Change 5 of the CLWRP could offset any nitrate reduction gains from Good Management Practice (GMP) and cause significant increases in nitrogen discharges to some sensitive water bodies e.g. Ashley Estuary (Te Aka Aka).”, The notified Waimakariri thresholds for winter grazing could affect the distribution of winter grazing in the zone, rather than the net amount of winter grazing. Ultimately this would offer little benefit to the environment.	Accept submission
Beef and Lamb New Zealand Limited	PC7-214.74 PC7-214.75 PC7-214.76 PC7-214.77 PC7-214.78 PC7-214.79 PC7-214.80	Policies 8.4.25, 8.4.26, 8.4.27 Rules 8.5.25, 8.5.26, 8.5.27 Table 8-9	The submitter seeks deletion of the proposed provisions in their entirety and replacing them with a regime that takes into account the natural capital of the soils and allocates nitrogen loss on a flat rate per hectare that is determine	Oppose	The NGF supports the allocative regime proposed in PC7, subject to the changes sought in the NGF’s Submission and this Further Submission. The NGF is concerned that a flat rate approach based on natural capital will result in significant adverse financial and social effects, with no gain for the	Reject submission

			by Land Use Capability (Natural Capital), amongst other matters.		environment from those outcomes provided for within the notified PC7 (subject to adoption of the Submissions and Further Submissions sought by the NGF).	
Christchurch City Council	PC7-337.93 PC7-337.97	Policy 8.4.27	The submitter seeks to amend Policy 8.4.27 to provide more restricted circumstances and clearer direction on where and why consent will be granted where the nitrogen loss reductions in Table 8-9 cannot be met within the Nitrate Policy Area; and to delete “ <i>progress to be made towards</i> ” from (e).	Oppose	It is unclear what further “ <i>restricted circumstances and clearer direction</i> ” is sought by the submitter. The NGF considers that it is important for extensions in timeframes to be available when it can be demonstrated that they are necessary and reasonable. The NGF supports the matters to be considered listed in a. to e. of Policy 8.4.27 as notified. With this, the NGF considers that landowners should be recognised for their efforts in reducing nitrogen losses to date, and the challenges involved in achieving reductions in the coming timeframes.	Reject submission
North Canterbury Fish and Game	PC7-95.20	Policy 8.4.28B	The submitter seeks to retain use of “ <i>equivalent loss rates</i> ” where the Portal is generating an erroneous number.	Support in part	The NGF supports the use of an Equivalent Baseline GMP Loss Rate or Equivalent GMP Loss Rate where it can be demonstrated that the Farm Portal is unable to generate a Baseline GMP Loss Rate or GMP Loss Rate, or the number generated is demonstrated to be erroneous. However, the NGF is concerned that Policy 8.4.28B, as notified, understates the potential for the Farm Portal to be unable to generate Baseline GMP Loss Rates or Good Management Practice Loss Rates, or to generate numbers that are erroneous.	Accept submission, subject to adoption of the changes sought in the NGF’s submission on Policy 8.4.28B
North Canterbury Fish and Game	PC7-95.21	Policy 8.4.28C	The submitter seeks that where resource consent is granted for the use of land for farming and restricts the nitrogen loss rate	Oppose	The NGF does not support the immediate replacement of an equivalent GMP loss rate when the farm portal is able to generate a GMP loss rate for the property.	Reject submission

			from the farming activity to an Equivalent Baseline GMP Loss Rate or Equivalent GMP Loss Rate, the conditions enable the immediate replacement of the loss rate in that consent when the farm portal is able to generate a Baseline GMP Loss Rate or GMP Loss Rate for that farming activity.		Farmers need certainty, and the potential for changes to nitrogen loss numbers during the term of a consent creates significant uncertainty. Further, the equivalent GMP loss rate (or baseline GMP loss rate) should best represent the farm, and while the portal may be improved (at some future time) and be better able to reflect the property, in theory, this shouldn't lead to the number changing.	
North Canterbury Fish and Game	PC7-95.27	Policy 8.4.35	The submitter considers that the five-year reporting cycle is too infrequent for the dynamic nature of climate and land use change in this Zone. Instead, they seek annual reporting on the parameters listed in Policy 8.4.35.	Support	The NGF supports annual reporting. They consider that this will ensure a better understanding of trends in water quality and quantity in the area, and will support more timely adaptive management.	Accept submission
North Canterbury Fish and Game	PC7-95.28	Policy 8.4.36	The submitter is seeking earlier common expiry dates for resource consents. They have sought that Policy 8.4.36 a), b) and c) adopt 2032 as the expiry date; and that Policy 8.4.36 d) adopt an expiry date of 2040.	Oppose	The NGF opposes this submission due to farmers needing to make investment decisions with a reasonable period of certainty about the regulatory requirements.	Reject submission
Ravensdown Limited	PC7-114.77	Policy 8.4.36	The submitter seeks that provided a queuing system is operated by Council (or similar), that Policy 8.4.36 be retained as notified.	Support in part	The NGF supports common expiry dates for consents, and agrees that a queuing system is needed to assist the processing of renewal consents. At the same time however, as noted in the NGF Submission, the NGF considers that Policies 8.4.36 and 8.4.37 should include provision for exemptions to the common expiry date, for example where large financial investments have been made in associated infrastructure.	Accept submission, subject to adoption of the changes sought in the NGF's submission on Policy 8.4.36.

Ravensdown Limited	PC7-114.78	Policy 8.4.37	The submitter seeks that provided a queuing system is operated by Council (or similar), Policy 8.4.36 be retained as notified.	Support	The NGF supports common expiry dates for consents, and agrees that a queuing system is needed to assist the processing of renewal consents. At the same time however, as noted in the NGF Submission, the NGF considers that Policies 8.4.36 and 8.4.37 should include provision for exemptions to the common expiry date, for example where large financial investments have been made in associated infrastructure.	Accept submission, subject to adoption of the changes sought in the NGF's submission Policy 8.4.37.
Royal Forest and Bird Protection Society Inc	PC7-472.112	Policies 8.5.30 and 8.5.30A, and Table 8-9	The submitter supports Policy 8.5.30 and Policy 8.5.30A, subject to an amendment to Table 8-9 to give effect to Te Mana o Te Wai. They consider that the staged reductions do not go far enough in scale and time.	Oppose	The proposed changes are not clear in terms of the more stringent and quicker reductions in nitrate losses sought. Further to this, increased percentage reductions in nitrogen loss are not supported by available data, and there has been no assessment of the economic and environmental outcomes of such changes.	Reject submission
Te Ngāi Tūāhuriri Rūnanga	PC7-399.7 PC7-399.65 PC7-399.67 PC7-399.75 PC7-399.8 PC7-399.66 PC7-399.69 PC7-399.76 PC7-399.53 PC7-399.64 PC7-399.70 PC7-399.77 PC7-399.71 PC7-399.78 PC7-399.68 PC7-399.79 PC7-399.72 PC7-399.80	Tables 8-1 to 8-8	The submitter seeks to substantially reduce the allocation limit and/or raise the minimum flow consistent with cultural flow recommendations for waterbodies listed in Tables 8-1 and 8-2, particularly for the Saltwater Creek, Waikuku Stream and Cust River. The submitter considers that allocation limits need to be reduced to an amount relative to the size of the waterbody, on the basis of how often cultural flow is achieved. In the alternative, the limits should be replaced by figures calculated relative to the	Oppose	The relief sought is not specific and leaves the possibility of substantial changes to the allocation limit and minimum flows. In the absence of specific alternative allocation limits and minimum flows being identified, the NGF is unable to support this submission.	Reject submission

	PC7-399.73 PC7-399.81 PC7-399.74 PC7-399.82		MALF or natural average recharge of the waterways.			
Bowden Environmental	PC7-84.25 PC7-84.26 PC7-84.27 PC7-84.28 PC7-84.29	Table 8-2	The submitter seeks the following: a) The addition of details of summations to confirm limits, and a note to the Table to provide flexibility should the summation later be shown to be incorrect. b) Change the Cam River minimum flow to 890 l/s. c) Allow B allocation limit of 1,000 l/s. d) Delete the Eyre River line from Table 8.2. e) Extend the implementation date to reflect most current consent expiry dates	Support	The NGF understands that the calculations informing the content of this table are flawed.	Accept submission
Bowden Environmental	PC7-84.30	Table 8-4	The submitter seeks the retention of the current limits as “interim” limits and amend the rule relating to allocation above the limit to be a noncomplying activity rather than a prohibited activity.	Support	The NGF understands that the calculations informing the content of this table are flawed. With this, it is not appropriate to prohibit activities (e.g. via Rule 8.5.16) based on poorly founded groundwater allocation limits.	Accept submission
North Canterbury Fish and Game	Reference in summary of submissions not found. See third paragraph under heading “Catchment	Table 8-5	The submitter is concerned with some of the high Phosphorus limits in Table 8-5, particularly those for spring-fed streams which are over 0.01 mg/l DRP. They are seeking that the limits over this amount be reduced or at least set at a “target” of 0.01 mg/l DRP.	Oppose	The NGF does not support further reductions to the limits in Table 8-5. The NGF is not aware of any evidence to support such changes.	Reject submission

	Water Quality Limits Table 8-5, 8-9, 8.8 and 8.9”					
North Canterbury Fish and Game	PC7-95.47	Table 8-5	The submitter seeks that Table 8-5 be amended to provide a 30% precautionary reduction in the notified N mg/l limits.	Oppose	The NGF does not support further reductions to the limits in Table 8-5. The NGF is not aware of any evidence to support such changes.	Reject submission
Royal Forest and Bird Protection Society Inc	PC7-742.121	Table 8-5	The submitter seeks an amendment to ecosystem health by adopting a precautionary dissolved organic N 5-year median of 0.4-0.5, and for this to apply to both surface and groundwater.	Oppose	The costs of such an amendment have not been considered, and associated timeframes have not been identified.	Reject submission
Royal Forest and Bird Protection Society Inc	PC7-742.122 PC7-742.123	Table 8-5	With respect to the Northern Waimakariri hill-fed lower and spring-fed plains area, the submitter seeks a reduction in the nitrate nitrogen limit to <1.0; and bringing the timeframe for achieving this forward to 2030	Oppose	The costs of such an amendment have not been considered.	Reject submission
Christchurch City Council	PC7-337.105 PC7-337.165 PC7-337.166	Table 8-7	The submitter seeks the following: i. Amend Table 8-7 to include the the Council deep aquifer bores with a limit of 1 mg/L Nitrate-Nitrogen. Add a table footnote as follows: “The limit for Christchurch City Council Deep Aquifer bores is the median value for all samples collected from all actively used bores or as determined by Christchurch City Council.”	Oppose	The NGF does not support further reductions to the limits in Table 8-7. The NGF is not aware of any evidence to support such changes.	Reject submission

			<p>ii. Reduce the limit for individual Waimakariri District Council community supply wells from 5.65 mg/L (maximum) to less than 1 mg/L for consistency with Christchurch and account for recent research on effects of nitrate nitrogen on human health and ecosystems.</p> <p>iii. Reduce the limit for Private water supply wells from 5.65 mg/L (median) to less than 1 mg/L for consistency with Christchurch and account for recent research on effects of nitrate nitrogen on human health and ecosystems.</p>			
Waimakariri District Council	PC7-3.38	Table 8-8	The submitter seeks an earlier nitrate target for the Cust groundwater zone, that is bringing the 2080 target forward to 2040.	Oppose	The NGF does not support bringing the 2080 target forward to 2040 for the Cust groundwater zone. The NGF is not aware of any evidence to support such a change.	Reject submission
Dairy Holdings Limited	Reference in summary of submissions not found. See Paragraphs 14.4 and 14.5 of the submission.	Table 8-9	The submitter notes that its operations are at good management practice (at least as described in Industry Agreed Good Management Practices Booklet (18 September 2015) (GMP Booklet)), while the Farm Portal has appeared to require further reductions over good management practice. Accordingly, the submitter seeks that the starting point for Table 8-9 takes into account the further reductions that might be required to even reach the Baseline GMP Loss Rate (i.e. over and above that set out in the GMP Booklet). Alternatively,	Support	The NGF agrees that the starting point for the percentage reductions in nitrogen loss must be clear and must correlate to the level of good management practice expected. There is significant variation between the Industry Agreed Good Management Practices Booklet (18 September 2015) and what appears to be expected through the Farm Portal calculations. It is important that a clear relationship exists (and is able to be shown through evidence) between the starting point, the percentage reductions, and the outcomes sought.	Accept submission

			the submitter seeks that the starting point be directly referenced to the GMP Booklet rather than the Baseline GMP Loss Rate.			
Christchurch City Council	PC7-337.107 PC7-337.168 PC7-337.169	Table 8-9	<p>The submitter seeks the following:</p> <ul style="list-style-type: none"> i. Amend Table 8-9 as shown below; including tighter timeframes for achieving the required nitrogen loss reductions. ii. Amend Table 8-9 (as shown below) to meet lower nitrate water quality limits and thresholds, shorten the timeframes and amalgamate zones as appropriate. iii. Environment Canterbury undertaking a proper alternatives evaluation in its Section 32, given the economic, social, recreational, and environmental value of the Christchurch aquifers as a drinking water supply for Christchurch and its contribution to maintaining ecological values in spring-fed rivers. iv. Amalgamate the five sub areas into one nitrate priority area. 	Oppose	<p>The proposed changes are not clear in terms of the “tighter timeframes” sought by the submitter.</p> <p>The increased percentage reductions are not supported by available data and there has been no assessment of the economic and environmental outcomes of such changes.</p>	Reject submission
Christchurch City Council	PC7-337.190	Table 8-9	Submitter seeks amendment to include a nitrate nitrogen water quality target of 0.1mg/L (annual median).	Oppose	The NGF does not support the introduction of a nitrate nitrogen water quality target of 0.1mg/L (annual median) into Table 8-	Reject submission

					9, and is not aware of any evidence to support such a change.	
North Canterbury Fish and Game	PC7-95.102	Table 8-9	The submitter seeks to reduce the achievement dates for nitrogen loss reductions.	Oppose	The proposed reduced timeframes for meeting the reductions in nitrogen loss are not achievable, and the costs associated with attempting to achieve these timeframes will be high and pose significant economic and social implications.	Reject submission
North Canterbury Province, Federated Farmers of New Zealand	PC7-430.144	Table 8-9	The submitter seeks that the nitrogen loss targets beyond 2030 be adaptively managed, based on rigorous and comprehensive environmental monitoring and the development of cost-effective management strategies and technologies to limit nitrogen loss.	Support in part	The NGF considers that adaptive management is critical to sustainable management and that long-term targets should be subject to review and updated regularly based on rigorous and comprehensive environmental monitoring.	Accept submission
Royal Forest and Bird Protection Society Inc	PC7-472.128	Table 8-9	Include dairy support in with dairy reductions.	Oppose	<p>The management of cows in dairy support systems is significantly different than managing milking herds, often with significantly lower stock levels that are more akin to beef cattle herds. There is no evidence to show that dairy support systems should be regulated differently to beef cattle herds.</p> <p>Further to this, the general understanding of what is 'dairy support' is not certain. For example, a farmer with 100 R2yr dairy heifers grazing on a predominantly crop and sheep farm could be considered to be dairy support, while the effects would be significantly less than an intensive dairy support block.</p>	Reject submission
Ravensdown Limited	PC7-114.60	Planning Maps, Nitrate Priority Area - New Layer	The submitter seeks that the Nitrate Priority Area be amended to be the area identified as the 'Nitrate Priority Management	Support	The notified NPA extends the Nitrate Priority Management Area from that identified in Map 3.1 of the Waimakariri	Accept submission

			Area_Rev 1' in Map 3.1 of the Waimakariri ZIPA (on p.29).		<p>ZIPA. These extensions include parts along the northern boundary of the Zone.</p> <p>The section 32 Report identifies that “...provisions are proposed specifically to manage risks to Christchurch’s aquifers. These include widening the spatial extent of the Nitrate Priority Area to include the majority of the modelled source area...” (p.298 of the section 32 Report). However, the NGF understands that this relationship between the northern areas and the aquifer that supplies water to Christchurch City is poorly founded.</p>	
Ravensdown Limited	PC7-114.61	Planning Maps - Nitrate Priority Subareas (A, B, C, D, E) - New Layer	The submitter seeks the deletion of the Nitrate Priority Area Sub-areas (A, B, C, D, E) new layer map; and consequential amendments to ensure that all references to the Nitrate Priority Area Sub-areas (A, B, C, D, E) are deleted from PC7.	Support	While the NGF generally supports the identification, and subsequent use, of the Nitrate Priority Areas within the Waimakariri sub-region, to provide focus to the reduction of nitrates), the NGF does not support the creation of the proposed sub-areas. The NGF understands that the modelling, upon which the establishment of the sub-areas A to E is based, has significant weaknesses and may not reflect reality.	Accept submission