

From: [Johanna King](#)
To: [Mailroom Mailbox](#)
Cc: [Eva Harris](#); ["ben.williams@chapmantripp.com"](#); ["rachel.robiliard@chapmantripp.com"](#); [Lauren Phillips](#); [Angela Christensen](#); ["gdeavoll@doc.govt.nz"](#); [Charlotte Wright](#); [Lionel Hume](#); ["peter.lowe2@xtra.co.nz"](#); ["rachel.mcclung@hortnz.com"](#); ["matthew.ross@ngaitahu.iwi.nz"](#); ["Georgina Hamilton"](#); ["n.snoyink@forestandbird.org.nz"](#); ["penny.gallagher@synlait.com"](#); ["jamie.robinson@duncancotterill.com"](#)
Subject: Plan Change 7 - Further Submission by Rangitata South Irrigation Limited
Date: Friday, 6 December 2019 3:51:39 PM

Kia ora,

Please find **attached** the further submission of Rangitata South Irrigation Limited on Plan Change 7 to the LWRP.

This further submission is contemporaneously served on each original submitter.

Nga mihi,
Johanna

Johanna King | Senior Solicitor



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and Partners

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E johanna.king@tp.co.nz

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Level 3, Tavendale and Partners Centre
329 Durham Street North
PO Box 442
Christchurch 8140, New Zealand
www.tp.co.nz



From the team at Tavendale and Partners.

We advise that our offices will close for the Christmas break on Friday, 20 December 2019 and will re-open at 8.30am on Monday, 13 January 2020.

From 1 July 2018, we are required to verify our clients identities and addresses, and obtain other information in accordance with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/ CFT).

[For more information, click here](#)

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

Clause 8 First Schedule, Resource Management Act 1991

TO: Environment Canterbury
Freepost 1201
Plan Change 7 to the Canterbury Land and Water Regional Plan
PO Box 345
Christchurch 8140

By email: mailroom@ecan.govt.nz

Name of Submitter:

- 1 Rangitata South Irrigation Limited (**RSIL**)
- Address: c/- Irrigo Centre Limited
326 Burnett Street,
Ashburton 7700
- Contact: John Wright / Johanna King
- Phone: (03) 928 8321
- Email: john@bcewater.co.nz / johanna.king@tp.co.nz

Proposal this further submission is on:

- 2 This is a further submission in support of (or in opposition to) submissions on the following change proposed to the following plan:
- Proposed Plan Change 7 to the Canterbury Land & Water Regional Plan (**PC7**)

Submitter's interest in the proposal

- 3 RSIL has an interest in the proposal that is greater than the interest the general public has, for the reasons given at paragraphs 6-15 of its original submission (dated 13 September 2019).

Further submissions in support

- 4 RSIL supports the submissions of:
- a) Acton Farmers Irrigation Co-operative, Submitter ID 154;
 - b) Ashburton Lyndhurst Irrigation Limited, Submitter ID 390;
 - c) Barrhill-Chertsey Irrigation Limited, Submitter ID 153;
 - d) Beef + Lamb NZ, Submitter ID 214;
 - e) Dairy Holdings Limited, Submitter ID 415;
 - f) Dairy NZ, Submitter ID 357;
 - g) Greenstreet Irrigation Society, Submitter ID 312;

- h) Hekeao Hinds Water Enhancement Trust, Submitter ID 345;
 - i) Horticulture New Zealand, Submitter ID 356;
 - j) MHV Water Limited, Submitter ID 218; and
 - k) Opuha Water Limited, Submitter ID 381.
- 5 RSIL supports the submissions identified in paragraph 4 above in their entirety, insofar as the submission points concern particular topics within the General Rules (Section 5) and the Orari-Ophihi-Pareroa-Temuka sub-regional chapter (Section 14), and any associated definitions (Section 2). The particular topics RSIL supports, and its reasons for doing so, are outlined in **Schedule 1** attached to this further submission.
- 6 RSIL also supports the submissions of:
- a) Ballance Agri-Nutrients Limited, Submitter ID 441;
 - b) Federated Farmers of New Zealand, Submitter ID 430;
 - c) Ravensdown Limited, Submitter ID 114; and
 - d) Synlait Milk Limited, Submitter ID 188.
- 7 RSIL supports the submissions in paragraph 7 in part, as outlined in **Schedule 2** attached to this further submission. The reasons for RSIL's support are further detailed in Schedule 2.

Further submissions in mixed support

- 8 RSIL has mixed support for the submissions of:
- a) Central South Island Fish and Game Council, Submitter ID 351;
 - b) The Director-General of the Department of Conservation, Submitter ID 160;
 - c) Nga Rūnanga of Canterbury, Submitter ID 423; and
 - d) Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu, Submitter ID 424.
- 9 RSIL supports and/or opposes the above submissions in part, as outlined in **Schedule 2** attached to this further submission. The reasons for RSIL's opposition are further detailed in Schedule 2.

Further submissions in opposition

- 10 RSIL opposes the submissions of the following submitter:
- a) Royal Forest & Bird Protection Society of NZ, Submitter ID 472; and
- 11 RSIL opposes the above submissions in part, as outlined in **Schedule 2** attached to this further submission. The reasons for RSIL's opposition are further detailed in Schedule 2.

Decisions sought

- 12 RSIL seeks:
- a) the parts of the submissions it supports to be allowed, in accordance with Schedule 1 and Schedule 2; and
 - b) the parts of the submissions it opposes be disallowed, as specified in Schedule 2.
- 13 Alternately, RSIL seeks that PC7 be amended to address the concerns raised in this further submission and any consequential amendments.

Wish to be heard:

- 14 RSIL wishes to be heard in support of its further submission.

Position as to joint case at hearing

- 15 If others make a similar submission, RSIL will consider presenting a joint case with them at a hearing.



Rangitata South Irrigation Limited

John Wright / Johanna King

Date: 6 December 2019

Submitter	Parts of submission supported		Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
<p>Acton Farmers Irrigation Co-operative, Submitter ID 154</p> <p>Ashburton Lyndhurst Irrigation Limited, Submitter ID 390</p> <p>Barrhill-Chertsey Irrigation Limited, Submitter ID 153</p> <p>Beef + Lamb NZ, Submitter ID 214</p> <p>Dairy NZ, Submitter ID 357</p> <p>Greenstreet Irrigation Society, Submitter ID 312</p> <p>Hekeao Hinds Water Enhancement Trust, Submitter ID 345</p> <p>Horticulture New Zealand, Submitter ID 356</p> <p>MHV Water Limited, Submitter ID 218</p> <p>Opuha Water Limited, Submitter ID 381</p>	<p>All submission points that relate to amendments regarding the policies, rules, maps, tables and definitions for—</p> <ul style="list-style-type: none"> • MAR; • TSA; • Commercial Vegetable Growing Operations; • Stock water; • the Transfer of water permits; • the Rangitata-Orton High Nitrogen Concentration Area— <p>in the General Rules (Section 5) and the Orari-Opihi-Pareroa-Temuka sub-regional chapter (Section 14), and any further associated definitions (Section 2)</p>		<p>Support</p>	<p>The reasons for RSIL's support of the submissions include, but are not limited to:</p> <ol style="list-style-type: none"> a) the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and b) the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions; c) the submission points recognise and provide for the importance of MAR in achieving water quality targets; d) the submission points recognise and provide more certainty for stock water amongst the notified proposals; and e) the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package). 	<p>Allow</p>
<p>Dairy Holdings Limited Submitter ID 415</p>	<p>PC7-415.21</p>	<p>Water quantity – allocation</p>	<p>Support</p>	<p>RSIL agrees to the proposed amendment to section 14 and to Table 14(zb) to clarify/confirm that all existing groundwater consents (including those connected to surface water) are treated as A Allocation in the Rangitata-Orton area, where no T Allocation is provided.</p>	<p>Allow</p>
	<p>PC7-415.22</p>	<p>Table 14(zb)</p>	<p>Support</p>	<p>This submission aligns with RSIL's submissions that any additional reductions (in particular regarding the Rangitata-Orton HNCA) focus on and measure success by comparison to the water quality targets to be achieved,</p>	<p>Allow.</p>
	<p>PC7-415.64</p>	<p>Nitrate – Reductions</p>	<p>Support</p>	<p>This submission aligns with RSIL's submissions that any additional reductions (in particular regarding the Rangitata-Orton HNCA) focus on and measure success by comparison to the water quality targets to be achieved,</p>	<p>Allow.</p>

				rather than measuring primarily on achieving particular percentage reductions.	
	PC7-415.13	Policy 14.4.20	Support	RSIL supports the amendment requested, to enable activities to exceed the Baseline GMP Loss Rate where the applicant can show that the proposed increase would not have an adverse environmental effect.	Allow.
	PC7-415.7	Map – Rangitata Orton HNCA	Support in part	RSIL supports the submission to alter the proposed Rangitata-Orton HNCA. However RSIL partly opposes this submission in part, because the most appropriate solution may not be to re-draw to cover the existing orange and red zones, as this submitter has requested. Those zones may currently be improving in terms of water quality targets, and the HCNA should only encompass the areas that warrant such additional reductions (for example, only cover the red zone, or only parts of the red zone (if at all)).	Allow in part.

Submitter	Parts of submission supported or opposed		Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
	Sub No.	Plan Provision			
Ballance Agri-Nutrients Limited Submitter ID 441	PC7-441.48	Section 32 Report	Support	The Submitter agrees the Section 32 Report does not adequately assess the potential and likely costs of the OTO sections of PC7 (particularly the provisions related to the nitrogen reductions, and the reliability of ground and surface water supply). Further assessment is required.	Allow.
Central South Island Fish and Game & SI Fish and Game Submitter ID 351	PC7-351.5 PC7-351.6 PC7-351.94 PC7-351.95	Policy 4.99 Policy 4.100	Oppose	The reasons for RSIL's opposition of the submissions include, but are not limited to: a) the submissions do not recognise nor provide for MAR to assist in achieving water quality targets	Disallow.
	PC7-351.36	Policy 14.4.13	Support	Retaining policy 14.4.13 for the transfer of water permits strikes a fair balance between realising farm productivity without compromising water quality outcomes.	Allow.
Director-General of the Department of Conservation Submitter ID 160	PC7-160.7	Policy 4.100	Oppose	The reasons for RSIL's opposition of the submission include, but are not limited to: a) the submission does not recognise nor provide for the ability of MAR to assist in achieving water quality targets;	Disallow.
	PC7-160.102	Table 14(zc)	Oppose	Reductions in High Nitrogen Concentration Areas should fairly and measurably reflect the reductions required to meet required outcomes and the reductions should cease where those outcomes are met in advance of the dates set in the Plan. Retaining Table 14(zc) may not align with RSIL's submissions or further submissions in respect of the extent of the Rangitata Orton High Nitrogen Concentration area and what additional reductions (if any remain justified) should apply.	Disallow.
	PC7-160.33	Rule 5.191	Support	Retaining Rule 5.191 as notified recognises and provides for the importance of MAR in achieving water quality targets.	Allow.
	PC7-160.81	Policy 14.4.13	Support	Retaining policy 14.4.13 for the transfer of water permits strikes a fair balance between realising farm productivity without compromising water quality outcomes.	Allow.

Federated Farmers of New Zealand Submitter ID 430	PC7-430.289	Farm Portal – general	Support	RSIL agrees with the submission to amend PC7 to either recognise and/or resolve existing issues with the Farm Portal and implement alternative process(es) for farm systems that are unable to be modelled by Overseer	Allow.
	PC7-430.27	Rule 5.42CE	Support	Further to RSIL's submissions on this issue, RSIL agrees prohibited status is inappropriate for commercial vegetable growing operations that cannot operate within the lawful nitrogen loss rate of a new or proposed location – limited exceptions ought to be able to be provided for, given the drivers behind the NPS-HPL and the need to provide for the ability to increase the food supply for New Zealand and avenues by which the food growers can do that, and non-complying status is best to achieve that.	Allow.
	PC7-430-254	Rules 14.5.23	Support	This submission aligns with RSIL's submission in relation to Table 14(zc) and RSIL also supports retaining Rule 14.5.23 as notified, provided the amendments it seeks to Table 14(zc) (in RSIL's original submission or this further submission) are made.	Allow.
	PC7-430.290	Section 32 Report	Support	The Submitter agrees the Section 32 Report does not adequately assess the potential and likely costs of the OTOP sections of PC7 (particularly the provisions related to the nitrogen reductions, and the reliability of ground and surface water supply). Further assessment is required.	Allow
	PC7-430.14	Policy 4.100	Support	RSIL acknowledges that the drafting proposed in this submission to the MAR policy may be another means to achieve the ends requested in RSIL's original and further submissions on the policy.	Allow.
Nga Rūnanga of Canterbury Submitter ID 423	PC7-423.92	Managed aquifer recharge – general	Oppose	MAR ought to be able to be implemented in the OTOP sub region to help assist with achieving water quality and quantity targets. The reasons for RSIL's opposition of the submissions include, but are not limited to: <ul style="list-style-type: none"> a) the submission does not recognise nor provide for the ability of MAR to assist in achieving water quality targets; and b) MAR should not be a last resort - RSIL does not agree that alternative mitigations in addition to MAR, must have been undertaken prior to applying for consent to undertake MAR. Such alternative mitigations may be bundled with the MAR package and undertaken contemporaneously, both for the betterment of water quality and quantity outcomes. 	Disallow.
	PC7-423.19	Policy 4.99	Oppose		
	PC7-423.67	Rule 5.191	Oppose		
	PC7-423.7	Definition 'Managed	Support	The notified definition is appropriate.	Allow.

		aquifer recharge'			
	PC7-423.38	Rule 5.062	Oppose	Notification should remain as currently drafted in the LWRP.	Disallow.
Ravensdown Limited Submitter ID 114	PC7-114.27	Description of 'High Nitrogen Concentration Areas'	Support	The proposed amendment aligns with (and is consequential to) RSIL's submission and other points of further submission regarding requested changes to the notified reductions.	Allow.
	PC7-114.35	Policy 14.4.18	Support	RSIL considers the submitter's proposed amendments may be another means to achieve the ends requested in RSIL's original and further submissions on the issue of the extent of the Rangitata Orton High Nitrogen Concentration Area and what reductions and timeframes ought to apply.	Allow
	PC7-114.36	Policy 14.4.19			
	PC7-114.37	Rule 14.5.15			
	PC7-114.43	Rule 14.5.19			
	PC7-114.49	Rule 14.5.23			
	PC7-114.53	Table 14(zc)			
	PC7-114.59				
PC7-114.101					
PC7-114.102					
Royal Forest & Bird Protection Society of NZ Submitter ID 472	PC7-472.10 and PC7-472.11	Definition 'Managed aquifer recharge'	Oppose	The reasons for RSIL's opposition of the submissions include, but are not limited to: c) the submission does not recognise nor provide for the ability of MAR to assist in achieving water quality targets; and d) MAR should not be a temporary 'last resort' and therefore should not have non-complying status.	Disallow.
	PC7-472.33	Policy 4.99			
	PC7-472.34-39	Policy 4.100			
	PC7-472.71-76	Rule 5.191			
	PC7-472.16	Definition 'Targeted	Oppose	The reasons for RSIL's opposition of the submissions include, but are not limited to:	Disallow.

	stream augmentation'			<p>a) the submission does not recognise nor provide for the ability of TSA to assist in achieving water quality targets; and</p> <p>b) TSA should not be a temporary 'last resort' and therefore should not have non-complying status.</p>	
PC7-472.51	Rule 5.062	Oppose		Notification and/or public input should remain as currently drafted in the LWRP.	Disallow.
PC7-472.52	Rule 5.063	Oppose		Non-complying status is inappropriate where the land use activity is already authorised by a resource consent under the Plan. The notified proposals were to update the cross-references to new proposed rules, not to re-open debate on the activity status.	Disallow.
PC7-472.58	Rule 5.133	Oppose		Notification should remain as currently drafted in the LWRP.	Disallow.
PC7-472.59 and PC7-472.60	Rule 5.136 and 5.137	Oppose		It is not appropriate to amend the activity status in either of these rules, as the conditions appropriately limit the effects of the activity.	Disallow.
PC7-472.156	Policy 14.4.12	Oppose		It is appropriate to retain this policy to ensure viability to ongoing farming uses, for example when an irrigation scheme supply is still working to maximise delivery and seasonal reliability.	Disallow.
PC7-472.157	Policy 14.4.13	Oppose		100% surrender on renewal of water takes is unworkable and impractical in terms of ongoing farm viability	Disallow.
PC7-472.165 PC7-472.173 PC7-472.174 PC7-472.191 PC7-472.164	Policy 14.4.18 Policy 14.4.19 Policy 14.4.28 Rule 14.5.23 Table 14(zc)	Oppose		Reductions in High Nitrogen Concentration Areas ought not increase over the life of the plan, but should fairly and measurably reflect the reductions required to meet required outcomes and the reductions should cease where those outcomes are met in advance of the dates set in the Plan. In particular, the extent of the Rangitata Orton High Nitrogen Concentration area has not been sufficiently justified, and the notified reductions should only apply in those areas that require it (for example, red zone areas that have not seen any improvement in water quality in recent years).	Disallow.

	PC7-472.171	Policy 14.4.20A	Oppose	It is appropriate for a decision maker to consider the capital and operational costs of achieving the nitrogen loss rate reductions and the benefit of spreading that investment over time, given the significant level of custodianship farming entities have over their properties, and given the significant expenditure and time commitment to such improvements.	Disallow.
	PC7-472.190	Rule 14.5.12	Oppose	The notified policy is appropriate and ought to be retained. 100% surrender of takes on transfer is unworkable and impractical in terms of ongoing farm viability	Disallow.
Synlait Milk Limited Submitter ID 188	PC7-188.16	Policy 14.4.15	Support	The submission recognises the temporary nature of ephemeral streams and as such temporary fencing is appropriate to protect water quality outcomes.	Allow.
	PC7-188.19	Table 14(zc)	Support	The reasons for RSIL's support of the submission include, but are not limited to: a) the submission points strike a fair balance between realising farm productivity without compromising water quality outcomes; and b) the submission points address the oppressive timeframes and reductions imposed by the notified Table 14(zc)	Allow.
Te Rūnanga o Arowhenua and Te Rūnanga o Ngāi Tahu Submitter ID 424	PC7-424.195	Managed aquifer recharge – general	Oppose	MAR ought to be able to be implemented in the OTOP sub region to help assist with achieving water quality and quantity targets. The reasons for RSIL's opposition of the submissions include, but are not limited to: a) the submission does not recognise nor provide for the ability of MAR to assist in achieving water quality targets; and b) MAR should not have non-complying status.	Disallow.
	PC7-424.123	Rule 5.191			
	PC7-430.309 and related submission points	Matters of discretion relating to Rock Art Management Areas	Support	RSIL supports adding matters of discretion to rules to provide consideration for and adequate protection of, Rock Art Management Areas.	Allow.
	PC7-424.7	Policy 14.4.22	Oppose	The proposed amendment opens the application of the policy to all consent holders, not just Timaru District Council as intended. This is an inappropriate enlargement of the Policy.	Disallow.
	PC7-424.35	Rule 14.5.23	Oppose	RSIL is opposed to changing the notification note in this rule.	Disallow.

	PC7424.196	Table 14(zc)	Oppose	<p>Reductions in High Nitrogen Concentration Areas should fairly and measurably reflect the reductions required to meet required outcomes and the reductions should cease where those outcomes are met in advance of the dates set in the Plan. Retaining Table 14(zc) as notified may not align with RSIL's submissions or further submissions in respect of the extent of the Rangitata Orton High Nitrogen Concentration area and what additional reductions (if any remain justified) should apply.</p>	Disallow.
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From: [Johanna King](#)
To: [Tavisha Fernando](#)
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited
Date: Friday, 20 December 2019 10:15:19 AM
Attachments: [xmas0c9a65](#)
[Addendum to RSIL further submission Schedule 1.pdf](#)

Kia ora Tavisha,

Please find **attached** the requested addendum to RSIL's further submission.

The original Schedule 1 is shown on the first page, and the subsequent pages address each topic of support, as a further appendix to Schedule 1.

Please do get in touch if you require anything further

Kind regards,
Johanna



From the team at Tavendale and Partners.

We advise that our offices will close for the Christmas break on Friday, 20 December 2019 and will re-open at 8.30am on Monday, 13 January 2020.

From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Sent: Thursday, 19 December 2019 4:36 PM
To: Johanna King <johanna.king@tp.co.nz>
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Tena koe Johanna

We need this returned as soon as possible, by close of business tomorrow.

Nga mihi

Tavisha

From: Johanna King <johanna.king@tp.co.nz>
Sent: Wednesday, 18 December 2019 12:03 PM
To: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Kia ora Tavisha,

What sort of timeframe does Council needs this returned by?

Kind regards,
Johanna

Johanna King | Senior Solicitor



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and Partners

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From the team at Tavendale and Partners.

We advise that our offices will close for the Christmas break on Friday, 20 December 2019 and will re-open at 8.30am on Monday, 13 January 2020.

From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>

Sent: Tuesday, 17 December 2019 10:22 AM

To: Johanna King <johanna.king@tp.co.nz>

Subject: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Tena koe Johanna

We are currently processing the further submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan received on behalf of Rangitata South Irrigation Limited.

In order for us to ensure that the further submission points are assigned to the correct original submission points, can you please clarify the submission points that are being referenced in the first point in the table.

Nga mihi

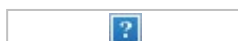
Tavisha

Tavisha Fernando

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Addendum to Further Submission – Rangitata South Irrigation Limited

Further Submission – Schedule 1 (original)

Submitter	Parts of submission supported	Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
<p>Acton Farmers Irrigation Co-operative, Submitter ID 154</p> <p>Ashburton Lyndhurst Irrigation Limited, Submitter ID 390</p> <p>Barrhill-Chertsey Irrigation Limited, Submitter ID 153</p> <p>Beef + Lamb NZ, Submitter ID 214</p> <p>Dairy NZ, Submitter ID 357</p> <p>Greenstreet Irrigation Society, Submitter ID 312</p> <p>Hekeao Hinds Water Enhancement Trust, Submitter ID 345</p> <p>Horticulture New Zealand, Submitter ID 356</p> <p>MHV Water Limited, Submitter ID 218</p> <p>Opuha Water Limited, Submitter ID 381</p>	<p>All submission points that relate to amendments regarding the policies, rules, maps, tables and definitions for—</p> <ul style="list-style-type: none"> • MAR; • TSA; • Commercial Vegetable Growing Operations; • Stock water; • the Transfer of water permits; • the Rangitata-Orton High Nitrogen Concentration Area— <p>in the General Rules (Section 5) and the Orari-Opihi-Pareroa-Temuka sub-regional chapter (Section 14), and any further associated definitions (Section 2)</p>	<p>Support</p>	<p>The reasons for RSIL's support of the submissions include, but are not limited to:</p> <ol style="list-style-type: none"> 1.1 the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and 1.2 the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions; 1.3 the submission points recognise and provide for the importance of MAR in achieving water quality targets; 1.4 the submission points recognise and provide more certainty for stock water amongst the notified proposals; and 1.5 the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package). 	<p>Allow</p>

Addendum to Further Submission – Rangitata South Irrigation Limited

Further Submission – Schedule 1, Appendix 1 : MAR & TSA

Submitter	Parts of submission supported	Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
Acton Farmers Irrigation Co-operative , Submitter ID 154 Ashburton Lyndhurst Irrigation Limited , Submitter ID 390 Barrhill-Chertsey Irrigation Limited , Submitter ID 153 Beef + Lamb NZ , Submitter ID 214 Dairy NZ , Submitter ID 357 Greenstreet Irrigation Society , Submitter ID 312 Hekeao Hinds Water Enhancement Trust , Submitter ID 345 Horticulture New Zealand , Submitter ID 356 MHV Water Limited , Submitter ID 218 Opuha Water Limited , Submitter ID 381	PC7-390.1 PC7-390.2 PC7-218.5 PC7-218.6 PC7-218.9 PC7-218.11 PC7-153.11 PC7-154.8 PC7-312.17 PC7-156.3 PC7-154.3 PC7-345.1 PC7-312.4 PC7-153.9 PC7-214.16 PC7-154.6 PC7-345.3 PC7-381.1 PC7-312.15 PC7-357.4 PC7-356.19 PC7-153.10	Support	The reasons for RSIL's support of the submissions include, but are not limited to: 1.6 the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and 1.7 the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions; 1.8 the submission points recognise and provide for the importance of MAR in achieving water quality targets; 1.9 the submission points recognise and provide more certainty for stock water amongst the notified proposals; and 1.10 the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package).	Allow

Addendum to Further Submission – Rangitata South Irrigation Limited

	PC7-214.17			
	PC7-154.7			
	PC7-357.5			
	PC7-345.4			
	PC7-381.2			
	PC7-312.16			
	PC7-218.12			
	PC7-345.5			
	PC7-218.7			
	PC7-218.8			
	PC7-357.9			
	PC7-381.5			
	PC7-218.10			
	PC7-153.24			
	PC7-154.20			
	PC7-345.6			
	PC7-345.7			
	PC7-312.50			
	PC7-312.57			
	PC7-312.58			
	PC7-356.45			
	PC7-154.26			
	PC7-153.27			
	PC7-381.6			
	PC7-381.7			

Addendum to Further Submission – Rangitata South Irrigation Limited

Further Submission – Schedule 1, Appendix 2 : Commercial Vegetable Growing Operations

Submitter	Parts of submission supported	Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
Acton Farmers Irrigation Co-operative , Submitter ID 154 Ashburton Lyndhurst Irrigation Limited , Submitter ID 390 Barrhill-Chertsey Irrigation Limited , Submitter ID 153 Beef + Lamb NZ , Submitter ID 214 Dairy NZ , Submitter ID 357 Greenstreet Irrigation Society , Submitter ID 312 Hekeao Hinds Water Enhancement Trust , Submitter ID 345 Horticulture New Zealand , Submitter ID 356 MHV Water Limited , Submitter ID 218 Opuha Water Limited , Submitter ID 381	PC7-153.3 PC7-153.1 PC7-390.3 PC7-153.2 PC7-390.5 PC7-356.13 PC7-356.17 PC7-356.8 PC7-156.21 PC7-153.15 PC7-153.16 PC7-154.12 PC7-312.27 PC7-356.36 PC7-356.46 PC7-154.24 PC7-153.4 PC7-154.1 PC7-312.1 PC7-153.5 PC7-214.2 PC7-154.2	Support	The reasons for RSIL's support of the submissions include, but are not limited to: 1.11 the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and 1.12 the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions; 1.13 the submission points recognise and provide for the importance of MAR in achieving water quality targets; 1.14 the submission points recognise and provide more certainty for stock water amongst the notified proposals; and 1.15 the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package).	Allow

Addendum to Further Submission – Rangitata South Irrigation Limited

	PC7-312.2			
	PC7-312.3			
	PC7-356.2			
	PC7-356.10			
	PC7-312.11			
	PC7-154.5			
	PC7-312.12			
	PC7-154.23			
	PC7-153.28			
	PC7-312.61			
	PC7-356.12			
	PC7-153.8			
	PC7-214.40			
	PC7-153.14			
	PC7-154.11			
	PC7-390.4			
	PC7-312.22			
	PC7-312.26			
	PC7-356.31			
	PC7-114.11			
	PC7-154.13			
	PC7-312.28			
	PC7-154.25			
	PC7-153.29			
	PC7-312.62			
	PC7-153.17			
	PC7-312.23			

Addendum to Further Submission – Rangitata South Irrigation Limited

	PC7-356.32			
	PC7-312.24			
	PC7-153.18			
	PC7-214.42			
	PC7-154.14			
	PC7-312.29			
	PC7-356.37			
	PC7-312.25			
	PC7-153.19			
	PC7-214.43			
	PC7-154.15			
	PC7-312.30			
	PC7-356.38			
	PC7-214.44			
	PC7-312.31			
	PC7-356.39			
	PC7-356.59			

Addendum to Further Submission – Rangitata South Irrigation Limited

Further Submission – Schedule 1, Appendix 3 : Stock water

Submitter	Parts of submission supported	Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
<p>Acton Farmers Irrigation Co-operative, Submitter ID 154</p> <p>Ashburton Lyndhurst Irrigation Limited, Submitter ID 390</p> <p>Barrhill-Chertsey Irrigation Limited, Submitter ID 153</p> <p>Beef + Lamb NZ, Submitter ID 214</p> <p>Dairy NZ, Submitter ID 357</p> <p>Greenstreet Irrigation Society, Submitter ID 312</p> <p>Hekeao Hinds Water Enhancement Trust, Submitter ID 345</p> <p>Horticulture New Zealand, Submitter ID 356</p> <p>MHV Water Limited, Submitter ID 218</p> <p>Opuha Water Limited, Submitter ID 381</p>	<p>PC7-214.8</p> <p>PC7-214.60</p> <p>PC7-214.116</p> <p>PC7-214.141</p>	<p>Support</p>	<p>The reasons for RSIL's support of the submissions include, but are not limited to:</p> <p>1.16 the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and</p> <p>1.17 the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions;</p> <p>1.18 the submission points recognise and provide for the importance of MAR in achieving water quality targets;</p> <p>1.19 the submission points recognise and provide more certainty for stock water amongst the notified proposals; and</p> <p>1.20 the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package).</p>	<p>Allow</p>

Addendum to Further Submission – Rangitata South Irrigation Limited

Further Submission – Schedule 1, Appendix 4 : Transfer of Water Permits

Submitter	Parts of submission supported	Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
<p>Acton Farmers Irrigation Co-operative, Submitter ID 154</p> <p>Ashburton Lyndhurst Irrigation Limited, Submitter ID 390</p> <p>Barrhill-Chertsey Irrigation Limited, Submitter ID 153</p> <p>Beef + Lamb NZ, Submitter ID 214</p> <p>Dairy NZ, Submitter ID 357</p> <p>Greenstreet Irrigation Society, Submitter ID 312</p> <p>Hekeao Hinds Water Enhancement Trust, Submitter ID 345</p> <p>Horticulture New Zealand, Submitter ID 356</p> <p>MHV Water Limited, Submitter ID 218</p> <p>Opuha Water Limited, Submitter ID 381</p>	<p>PC7-214.60</p> <p>PC7-214.114</p> <p>PC7-381.37</p> <p>PC7-356.60</p> <p>PC7-381.75</p> <p>PC7-214.141</p> <p>PC7-381.69</p> <p>PC7-381.74</p> <p>PC7-381.76</p>	<p>Support</p>	<p>The reasons for RSIL's support of the submissions include, but are not limited to:</p> <p>1.21 the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and</p> <p>1.22 the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions;</p> <p>1.23 the submission points recognise and provide for the importance of MAR in achieving water quality targets;</p> <p>1.24 the submission points recognise and provide more certainty for stock water amongst the notified proposals; and</p> <p>1.25 the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package).</p>	<p>Allow</p>

Addendum to Further Submission – Rangitata South Irrigation Limited

Further Submission – Schedule 1, Appendix 5 : the Rangitata-Orton High Nitrogen Concentration Area

Submitter	Parts of submission supported	Oppose/Support	Reasons	Decision(s) sought on the submission point(s)
<p>Acton Farmers Irrigation Co-operative, Submitter ID 154</p> <p>Ashburton Lyndhurst Irrigation Limited, Submitter ID 390</p> <p>Barrhill-Chertsey Irrigation Limited, Submitter ID 153</p> <p>Beef + Lamb NZ, Submitter ID 214</p> <p>Dairy NZ, Submitter ID 357</p> <p>Greenstreet Irrigation Society, Submitter ID 312</p> <p>Hekeao Hinds Water Enhancement Trust, Submitter ID 345</p> <p>Horticulture New Zealand, Submitter ID 356</p> <p>MHV Water Limited, Submitter ID 218</p> <p>Opuha Water Limited, Submitter ID 381</p>	<p>PC7-381.11</p> <p>PC7-381.46</p> <p>PC7-357.49</p> <p>PC7-381.47</p> <p>PC7-357.73</p> <p>PC7-357.51</p> <p>PC7-214.126</p> <p>PC7-357.52</p> <p>PC7-357.75</p> <p>PC7-381.48</p> <p>PC7-214.142</p> <p>PC7-357.55</p> <p>PC7-357.61</p> <p>PC7-214.127</p> <p>PC7-214.134</p> <p>PC7-357.67</p> <p>PC7-357.68</p> <p>PC7-381.113</p> <p>PC7-357.76</p>	<p>Support</p>	<p>The reasons for RSIL's support of the submissions include, but are not limited to:</p> <p>1.26 the submission points strike a fair balance between realising farm productivity without compromising water quality and quantity outcomes, and in fact working towards achieving improved outcomes; and</p> <p>1.27 the submission points address the oppressive reductions and/or timeframes imposed by the notified provisions;</p> <p>1.28 the submission points recognise and provide for the importance of MAR in achieving water quality targets;</p> <p>1.29 the submission points recognise and provide more certainty for stock water amongst the notified proposals; and</p> <p>1.30 the submission points recognise and promote the importance of commercial vegetable and fruit growers (however RSIL agrees with the further submission of Horticulture NZ that further caucusing would be of benefit to the proposed package).</p>	<p>Allow</p>

From: [Johanna King](#)
To: [Tavisha Fernando](#)
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited
Date: Tuesday, 14 January 2020 11:53:22 AM

Good morning Tavisha,

Thank you for your email – unfortunately that is a typo.

The submission should read:

PC7- 430.309 <u>424.183</u> and related submission points	Matters of discretion relating to Rock Art Management Areas	Support	RSIL supports adding matters of discretion to rules to provide consideration for and adequate protection of, Rock Art Management Areas.	Allow.
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The related submission points are:

- PC7-424.95
- PC7-424.71
- PC7-424.72
- PC7-424.206
- PC7-424.110,

being the submission points that request the above submission be implemented into the OTOP rules.

Please let me know if ECan requires an amended/updated Addendum to be provided.

Kind regards,

Johanna King | Senior Solicitor



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and Partners**

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F +64 3 374 6888 M [64 21 917 140](#)
E johanna.king@tp.co.nz

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Level 3, Tavendale and Partners Centre
329 Durham Street North
PO Box 442
Christchurch 8140, New Zealand
www.tp.co.nz

From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Sent: Wednesday, 8 January 2020 2:22 PM
To: Johanna King <johanna.king@tp.co.nz>
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Tena koe Johanna

I hope you enjoyed the festive period, best wishes for 2020.

We have a further query on your submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan.

Your further submission on point 430.309 is included amongst your submission points for submitter 424 (Te Runanga o Arowhenua and Te Runanga o Ngai Tahu) however it is in relation to a submission point made by submitter 430 (Combined Canterbury Provinces, Federated Farmers of New Zealand), can you confirm that 430.309 is the correct submission point number? Can you also provide us with the submission point numbers that you are referring to when you mention related submission point on the above mentioned further submission point please?

Nga mihi

Tavisha

From: Johanna King <johanna.king@tp.co.nz>
Sent: Friday, 20 December 2019 10:15 AM
To: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Kia ora Tavisha,

Please find **attached** the requested addendum to RSIL's further submission.

The original Schedule 1 is shown on the first page, and the subsequent pages address each topic of support, as a further appendix to Schedule 1.

Please do get in touch if you require anything further

Kind regards,
Johanna



From the team at Tavendale and Partners.

We advise that our offices will close for the Christmas break on Friday, 20 December 2019 and will re-open at 8.30am on Monday, 13 January 2020.

From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Sent: Thursday, 19 December 2019 4:36 PM
To: Johanna King <johanna.king@tp.co.nz>
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Tena koe Johanna

We need this returned as soon as possible, by close of business tomorrow.

Nga mihi

Tavisha

From: Johanna King <johanna.king@tp.co.nz>
Sent: Wednesday, 18 December 2019 12:03 PM
To: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Subject: RE: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Kia ora Tavisha,

What sort of timeframe does Council needs this returned by?

Kind regards,
Johanna

Johanna King | Senior Solicitor



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www.tp.co.nz



From the team at Tavendale and Partners.

We advise that our offices will close for the Christmas break on Friday, 20 December 2019 and will re-open at 8.30am on Monday, 13 January 2020.

From: Tavisha Fernando <Tavisha.Fernando@ecan.govt.nz>
Sent: Tuesday, 17 December 2019 10:22 AM
To: Johanna King <johanna.king@tp.co.nz>
Subject: Further Submission - Plan Change 7 to the Land and Water Regional Plan - Rangitata South Irrigation Limited

Tena koe Johanna

We are currently processing the further submission on Proposed Plan Change 7 to the

Canterbury Land and Water Regional Plan received on behalf of Rangitata South Irrigation Limited.

In order for us to ensure that the further submission points are assigned to the correct original submission points, can you please clarify the submission points that are being referenced in the first point in the table.

Nga mihi

Tavisha

Tavisha Fernando

Planning Officer Hearings
Environment Canterbury
Christchurch Office



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