

From: [Suzette Bouwer](#) on behalf of [Ben Williams](#)
To: [Mailroom Mailbox](#)
Cc: [Peter Kingsbury](#); [Lionel Hume](#); [Charlotte Wright](#); "[rcosgrove@fishandgame.org.nz](#)"; "[carmen@planzconsultants.co.nz](#)"; "[geoff.meadows@wmk.govt.nz](#)"; [Rachel Robilliard](#); "[waimak.ngf@gmail.com](#)"
Subject: Plan Change 7 LWRP Further Submission
Date: Friday, 6 December 2019 3:43:34 PM

Kia ora,

Please find **attached** for filing, and by way of service, the further submission of **LARUNDEL DAIRY PARTNERSHIP** 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



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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 (subject: "Plan Change 7 LWRP Further Submission")

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

Name of person making further submission: **Larundel Dairy Partnership (Larundel)**

- 1 Larundel has an interest in the proposal that is greater than the interest of the public generally (in that it operates a 425 hectare dairy platform within a 625 hectare total operation on the border of West Eyreton and Swannanoa that is directly affected by the proposed changes).
- 2 If others make a similar submission, Larundel will consider presenting a joint case with them at a hearing.
- 3 Larundel's further submissions are set out in **Annexure 1**.

Signed for and on behalf of Larundel Dairy Partnership by its solicitors and authorised agents
Chapman Tripp



Ben Williams
Partner
6 December 2019

Address for service of submitter:

Larundel Dairy Partnership
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 – Larundel Further submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
Section 32 Evaluation Report PC7-349.23	Waimakariri Irrigation Limited (WIL)	Support	Larundel agrees that the costs associated with the proposed reductions required by Table 8-9 have not been sufficiently evaluated.	Accept the submission
Nitrate-Reductions PC7-337.142	Christchurch City Council	Oppose	Larundel does not support proposed reduction targets being increased and brought forward.	Reject the submission
General PC7-349.24	Waimakariri Irrigation Limited (WIL)	Support	Amendment to Section 8 to identify the outcomes being sought at a policy level and defer longer-term reductions until existing water quality is better understood and the model is ground-truthed is supported.	Accept the submission
Map - Nitrate Priority Subarea PC7-349.19	Waimakariri Irrigation Limited (WIL)	Support	Larundel supports the deletion of the Nitrate Priority Sub-areas from the Planning Maps in their entirety.	Accept the submission
08.04.04 PC7-114.66	Ravensdown Limited	Support	Larundel 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	Larundel supports the minor amendment proposed to clarify the waterbodies to which the policy applies.	Accept the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
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 Farmers of New Zealand	Support	Larundel supports the granting of resource consent to exceed Baseline GMP Loss Rates where the circumstances in the policy are met. Consistent with Larundel's original submission, this needs to be subject to changes also being sought in relation to Table 8-9.	Accept the submission
08.04.28B PC7-357.20	Dairy NZ Limited	Support	Larundel 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 PC7-425.3 PC7-425.16	Waimakariri Next Generation Farmers Trust	Support in part	Larundel supports in principle the proposal for a policy and method requiring Canterbury Regional Council to work with farmers, primary sector groups and other stakeholders, in the design and implementation of a water quality monitoring programme. However, Larundel seeks that the proposed policy is amended to provide greater certainty and clarity around how that engagement would take place and how the outcomes will be implemented.	Accept the submission, subject to amendment
08.04.New Policy PC7-425.31	Waimakariri Next Generation Farmers Trust	Support in part	Larundel supports the intent of a proposed policy and method that requires a robust programme of water quality monitoring to inform a review of the targets, but considers that its proposed new policy in submission PC7-179.9 is a more effective means of achieving the relief sought.	Accept the submission, subject to amendment

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
08.5.21 PC7-357.34	Dairy NZ Limited	Support	Larundel 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	Larundel 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). Larundel supports the general approach of pro-rata managing nutrient losses across properties that are only partially within the Nitrate Priority Area (subject to Larundel's submissions elsewhere that the Nitrate Priority Area be deleted).	Accept the submission
08.05.23 PC7-114.82	Ravensdown Limited	Support	Given Larundel's sought relief in relation to removing the Nitrate Priority Sub-Areas from Table 8-9 and elsewhere, Larundel 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, Larundel agrees it is unnecessary to additionally include Rule 8.5.30A.	Accept the submission
08.07.Table 8-4 PC7-425.29	Waimakariri Next Generation Farmers Trust	Support in part	Larundel supports the need to carefully consider groundwater limits and technical consideration needs to be given to ensuring existing limits (i.e. those applying prior to PC7) are only departed from where it is demonstrated actual allocation issues arise.	Accept the submission, subject to amendment
08.06.Table 8a PC7-357.36 08.06.Table 8a PC7-357.69, 70, 71 08.06.Table 8b PC7-357.39	Dairy NZ Limited	Support	Larundel supports the adoption of Tables 8a, 8b and 8-5 to 8-8 subject to the amendments proposed by the submitter. The amendments are necessary to better reflect reasonably achievable water quality outcomes.	Accept the submission

Reference	Submitter	Support/Oppose	The reason for the support/opposition	Relief sought
08.07.Table 8-5 PC7-357.38				
08.07.Table 8-6 PC7-357.37				
08.07.Table 8-7 PC7-357.40				
08.07.Table 8-8 PC7-357.41				
08.07.Table 8-9 PC7-337.107	Christchurch City Council	Oppose	Larundel opposes further changes to Table 8-9 (that would see reductions applying earlier and to a greater extent). Larundel seeks the changes to Table 8-9 as set out in its original submission.	Reject the submission
08.07.Table 8-9 PC7-337.168				
08.07.Table 8-9 PC7-95.102	North Canterbury Fish and Game Council	Oppose	Larundel opposes further changes to Table 8-9 (that would see reductions applying earlier). Larundel seeks the changes to Table 8-9 as set out in its original submission.	Reject the submission