From: Lionel Hume
To: Mailroom Mailbox
Subject: Plan Change 7 LWRP Further Submission
Date: Friday, 6 December 2019 4:50:32 PM

Dear Sir/Madam,

Attached is Federated Farmers' further submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan (I have attached both the PDF and Word files).

Yours sincerely,

DR LIONEL HUME
SENIOR POLICY ADVISOR

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FEDERATED FARMERS OF NEW ZEALAND

Federated Farmers of New Zealand

Further Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

6 December 2019

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

Form 6
Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan
Clause 8 of First Schedule, Resource Management Act 1991

To: *Canterbury Regional Council*
PO Box 345
Christchurch 8140

Name of further submitter: Combined Canterbury Provinces, Federated Farmers of New Zealand

Contact person: Dr Lionel Hume
Senior Policy Advisor

Address for service: PO Box 414, Ashburton 7740 or lhume@fedfarm.org.nz

This is a further submission in response to submission/s made on the following: Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan.

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

Federated Farmers wishes to be heard in support of its further submission.

Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Waimakariri Group	171.16	General seeking amendment	Oppose	The proposed plan has already generously addressed those issues.
Waimakariri Group	171.18	General seeking amendment	Oppose	The proposed plan has already taken a precautionary approach with regard to a wide range of issues.
Moody, D C	118.2	Consultation	Oppose	Mandatory consultation with this group is inappropriate.
Waimakariri Next Generation Farmers Trust	425.33	Legal Issues	Oppose	PC7 should be considered on its own merits independently of the draft NPS-FM and NES-FW. However, sufficient time should be allowed for the PC7 process to enable well considered decisions to be reached.
Stenhouse, D	436.3	Legal Issues	Oppose	PC7 should be considered on its own merits independently of the policies of the current government and the draft NPS-FM and NES-FW.
Orari River Protection Group	551.14	Legal Issues	Oppose	PC7 should be considered on its own merits independently of the tightening national standards for waterways and aquifers, including the draft NPS-FM and NES-FW.
Parkdale Limited	353.22	General Investigations and Monitoring	Support	Accurate and reliable data is needed as a basis for future planning.
Spencer-Bower, M J	473.9	General Investigations and Monitoring	Support	Accurate and reliable data is needed as a basis for future planning.
Water and Wildlife Habitat Trust	88.112	General Allocation and Limits	Oppose	Notified proposals are intended to deliver that.
Water and Wildlife Habitat Trust	88.113	General Allocation and Limits	Oppose	The request is excessive and has no reasonable basis.
New Zealand Pork	167.4	Water quantity - allocation	Support	Water must be available to support animal welfare and hygiene. This also applies to other farm types such as dairy.
Alsop, J	543.6	Water quantity - allocation	Oppose	Consent conditions must remain when properties (farms) are sold in order to maintain economic stability/certainty.
Beef + Lamb New Zealand	214.152	Water quality - allocation	Oppose in part	The submission includes some good principles but we question the scope or need for this content, at this stage. We also consider that there are two potentially major flaws, as follows: Principle 5:

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
				If a natural capital approach (based on Land Use Capability Class) is used, where greater rights to discharge nutrients are allocated to inherently better soils, this will result in those rights being allocated where they are not needed e.g. more to deep, fine textured soils with naturally greater fertility and less to shallow water-short soils. While it may sound sensible in principle, it disregards existing land-uses and would result in under-allocation for much of the Canterbury plains, that has 63% of shallow, stony soils. It fails to recognise the great productive potential of shallow, stony soils once the limitations due to water and nutrients are overcome. The problem with the principle as stated is that it would greatly reduce the productive potential of much currently highly productive land, including a large proportion of Canterbury. Principle 1: Equal allocation to land with the "same qualities" (presumably the same soils), without regard for existing land use, again sounds good in principle. However, it has the potential to create windfall gains to those who have relatively undeveloped land and places in jeopardy those who have legitimately, and in compliance with existing laws and regulations, invested in developing greater intensity land uses.
Orari River Protection Group	551.16	Water quality (general except nitrate)	Oppose	There is already a large degree of precaution.
Mauger, A L	157.1	Nitrate - General	Oppose	Concentrations of <1mg/L are unachievable in many situations.
Water and Wildlife Habitat Trust	88.45	Stock Exclusion from waterways	Oppose	Existing provisions (both operational and notified) are sufficient. Effective means of exclusion are often site-specific. Provisions should focus on exclusion rather than fencing (which is but one exclusion tool).
Stewart, S	334.5	Stock Exclusion from waterways	Support	For practical farm working reasons, horses need to be able to cross waterways.
Waimate District Council	279.11	Stock Exclusion from waterways	Support	For practical farm working reasons, farm animals need to be able to cross waterways during mustering.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Waimate District Council	279.12	Stock Exclusion from waterways	Support	For practical farm working reasons, horses need to be able to cross waterways.
Water and Wildlife Habitat Trust	88.61	General	Oppose	Inappropriate because of the poor quality of mapping – including lack of ground-truthing.
Rural Advocacy Network	481.1	Habitats of Indigenous Species	Support	Consistent with Federated Farmers' submission on indigenous freshwater species habitat.
Gardiner, A	504.3	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon.
Armstrong, B	520.2	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon.
Berry, I J	282.1	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon.
Podobinski, M	52.1	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon.
De Joux, P R	48.2	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon.
Seddon, C	383.1	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon. There is no good reason why this should necessarily be done on a case by case or that Fish & Game should be consulted.
Pickering, D	518.2	Freshwater Fishery	Oppose	Priority must be given to indigenous species over trout and salmon.
McCains Food	187.7	Commercial Vegetable Growing	Support	The s32 statement is not correct.
McCains Food	187.9	Commercial Vegetable Growing	Support	The s32 statement is not correct. Nutrient losses depend on many factors, including crop, soil type and standard of management.
Alex McDonald Ltd	6.5	Commercial Vegetable Growing	Support	This flexibility would assist effective management.
Water and Wildlife Habitat Trust	88.65 – 88.71	Commercial Vegetable Growing	Oppose	Existing provisions (both operational and notified) are sufficient.
Barrhill Chertsy Irrigation Limited (BCIL)	153.11	Managed aquifer Recharge	Support	Enables effective management of consented water takes.
Horticulture New Zealand	356.21	Commercial vege growing	Support	Provides for low intensity land use.
Horticulture New Zealand	356.2	02.09 Commercial vegetable growing operation	Support	Clarifies the definition.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Royal Forest and Bird Protection Society Inc.	472.24,23,12,13,15,14,16		Oppose	Oppose new definitions. Simpler to rely on plain English.
Christchurch City Council	337.5	02.09 Non-consumptive	Oppose	The definition would allow the transfer of water between water bodies within "the wider hydrological system". Therefore, there would be consumption at a local scale.
Beef + Lamb new Zealand	214.9	04.Table1a	Support	Practical approach.
Beef + Lamb new Zealand	214.10	04.Table1a	Support	Practical approach.
DairyNZ Limited	357.1	04.Table1a	Support	Provides consistency of approach.
Water and Wildlife Habitat Trust	88.7 – 88.16	04.Table1a	Oppose	Existing provisions (both operational and notified) are sufficient.
North Canterbury Fish and Game Council	95.93 – 95.96	04.Table1a	Oppose	Existing provisions (both operational and notified) are sufficient.
Department of Conservation	160.3	04.Table 1b	Oppose	Existing provisions (both operational and notified) are sufficient
North Canterbury Fish and Game Council	95.56	04.Table 1b	Oppose	Existing provisions (both operational and notified) are sufficient
Water and Wildlife Habitat Trust	88.14, 88.15, 88.17, 88.18	04.Table1b	Oppose	Existing provisions (both operational and notified) are sufficient.
Bowden Environmental	84.1	04.0006	Support	Amendments needed to allow communities and farms to function.
MHV Water Limited (MHV)	218.8	04.100	Support in part	Support application of the policy to Targeted Stream Augmentation as well as MAR.
Hinds Drain Working Party	394.5	04.100	Support	Improves clarity.
Foate, J	523.1	04.102	Oppose	In many situations, trout and salmonids are invasive, pest and nuisance species (with regard to their predation on indigenous species).
Horticulture New Zealand	356.31	05.042CA	Support	Increased area increases the usefulness of permitted activity status.
Greenstreet Irrigation Society	312.28	05.042CB	Support	Allows for expansion of area in response to demand for locally grown produce.
Horticulture New Zealand	356.32	05.042CB	Support	Controlled activity status is appropriate given the constraints that are in place.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Barrhill Chertsey Irrigation Limited (BCIL)	153.18	05.042CB	Support	Oppose both conditions 2 and 3 of Rule 5.42CB.
Horticulture New Zealand	356.38	05.042CD	Support	Consistent with our submissions on Rules 5.42CD and 5.42CE.
Horticulture New Zealand	356.39	05.042CE	Support	Consistent with our submissions on Rules 5.42CD and 5.42CE.
Barrhill Chertsey Irrigation Limited (BCIL)	153.22	05.062	Support	Amended wording improves meaning.
Ravensdown Limited	114.16	05.63	Support	Consistent with other aspects of our submission/further submission.
Ravensdown Limited	114.17	05.64	Support	Consistent with other aspects of our submission/further submission.
Ravensdown Limited	114.18	05.67A	Support	Consistent with other aspects of our submission/further submission.
Barrhill Chertsey Irrigation Limited (BCIL)	153.23	05.111	Support	Amended wording clarifies meaning.
Beef + Lamb new Zealand	214.54	05.112	Support	Amended wording clarifies meaning
Water and Wildlife Habitat Trust	88.38, 88.39, 88.40, 88.41	05.161	Oppose	Wetland maps are unreliable and have not been ground-truthed.
Ellesmere Sustainable Agriculture Incorporated	207.36	05.189	Support	Consistent with Federated Farmers' submissions.
Hekaeo Hinds Water Enhancement Trust	345.7	05.191	Support	Amended wording makes the rule more functional.
Ellesmere Sustainable Agriculture Incorporated	207.38	05.191	Support	Makes the matter of discretion more complete.
Hinds Drains Working Party	394.7	05.191	Support	Discharge into an artificial waterway

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Central South Island Fish and Game Council	351.24	05.192	Oppose	Support the rule as notified.
Bowden Environmental	84.2	07.Table 6	Support	Support the original allocation limit. Insufficient justification for the proposed new limit.
Avon–Atakaro Network	91.9	Minimum flows	Oppose	Request is ill-defined and does not recognise realistic timeframes.
Demeter, J	275.1	Nitrate - General	Oppose	Proposed provisions are more than sufficient
Didham, T	227.1	Nitrate - General	Oppose	Requested limit is unachievable in many circumstances.
Black, L	128.15	Nitrate - General	Oppose	Requested limit is unachievable in many circumstances.
Dalziel, J	215.11	Nitrate – Drinking Water	Oppose	Proposed provisions are more than sufficient.
Wells, J	233.1	Nitrate – Drinking Water	Oppose	Requested limit and timeframe is unachievable in many circumstances
Warren, C	246.1	Nitrate – Drinking Water	Oppose	Requested limit is unachievable in many circumstances
Christchurch City Council	337.140	Nitrate – Drinking Water	Oppose	Requested limit is unachievable in many circumstances
Adriaens, G	151.6	Nitrate - Reductions	Oppose	Proposed provisions are more than sufficient
Buck, V	525.3	Nitrate - Reductions	Oppose	Proposed provisions have been well worked through and are more than sufficient.
Christchurch City Council	337.142	Nitrate – Reductions	Oppose	Proposed provisions have been well worked through and are more than sufficient.
Dalziel, J	215.6	Nitrate – Reductions	Oppose	Proposed provisions have been well worked through and are more than sufficient.
Dalziel, J	215.9	Nitrate – Reductions	Oppose	Proposed provisions have been well worked through and are more than sufficient. The NPS is only a draft at this stage and should not be considered.
Canterbury Aoraki Conservation Board	138.7	General	Oppose	Proposed provisions have been well worked through and are more than sufficient.
Huggins, T	13.1	General	Oppose	Proposed provisions have been well worked through and are more than sufficient.
Huggins, T	13.2	General	Oppose	Proposed provisions have been well worked through and are more than sufficient.
Waimakariri Irrigation Limited (WIL)	349.24	General	Support	Support deferring longer term reduction proposals until there is better understanding and ground-truthing of relevant biophysical processes.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Beef + Lamb New Zealand	214.68	08.04.08	Support	Improves the tone of the policy
Bowden Environmental	84.6	08.04.12	Support	Lists essential uses of water that must be provided for.
Bowden Environmental	84.7	08.04.16	Support	Transfer is an efficient way to re-distribute available water. The policy appears to apply even if water is not over-allocated (ground or surface water).
Bowden Environmental	84.9	08.04.18	Support	Region-wide policies adequately cover transfer and granting of consents in over-allocated zones.
Waimakariri District Council	3.11	08.04.22	Support	Clarifies the policy
Waimakariri Irrigation Limited (WIL)	349.4	08.04.23	Support	Support WIL's submission re – having the ability to support environmental flows.
Waimakariri Irrigation Limited (WIL)	349.24	General	Support	Support deferring longer term reduction proposals until there is better understanding and ground-truthing of relevant biophysical processes.
Croft, W D	139.16	08.04.26	Support	There are significant issues with nitrate priority areas and Table 8-9.
DairyNZ Limited	357.18	08.04.27	Support	An important additional consideration.
Waimakariri Next Generation Farmers Trust	425.12	08.04.28B	Support	Clarifies the meaning of the policy.
Waimakariri Next Generation Farmers Trust	425.14	08.04.28C	Support	When a consent is granted it should remain in place until it expires.
North Canterbury Fish and Game Council	95.28	08.04.36	Oppose	The notified schedule is very demanding. The schedule requested in this submission is excessive.
Royal Forest and Bird Protection Society	472.98	08.04.36	Oppose	The notified schedule is very demanding. The schedule requested in this submission is excessive.
Bowden Environmental	84.10	08.04.18	Support	Agree that short term consents impede long term planning.
Royal Forest and Bird Protection Society	472.100	08.04.36	Oppose	The notified schedule is very demanding. The schedule requested in this submission is excessive.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Royal Forest and Bird Protection Society	472.101	08.04.36	Oppose	The notified schedule is very demanding. The schedule requested in this submission is excessive.
Waimakariri Irrigation Limited (WIL)	349.6	08.04.New Policy	Support	Support the requested strategies for improvement of water quality.
Waimakariri Next Generation Farmers Trust	425.3	08.04.New Policy	Support	Support collaborative approach and comprehensive and accurate monitoring to underpin current and future planning.
Waimakariri Next Generation Farmers Trust	425.31	08.04.New Policy	Support	Support collaborative approach and comprehensive and accurate monitoring to underpin current and future planning.
Bowden Environmental	84.13, 14 & 15	08.05.09	Support	For the reasons given in the original submission.
Bowden Environmental	84.16	08.05.10	Support	For the reasons given in the original submission.
Waimakariri District Council	3.19	08.05.10	Support	Discretionary activity status is appropriate and allows a full range of issues to be considered.
Bowden Environmental	84.21	08.05.14	Support	For the reasons given in the original submission.
Bowden Environmental	84.17 & 18	08.05.14	Support	For the reasons given in the original submission.
Bowden Environmental	84.19	08.05.15	Support	For the reasons given in the original submission.
Bowden Environmental	84.19	08.05.16	Support	For the reasons given in the original submission.
North Canterbury Fish and Game Council	95.34	08.05.17	Oppose	Any reduction of the rate or volume of water to be transferred should be based on consented rate or volume. Use in any one year, or period of years, will be dependent on a variety of factors (including rainfall) and may not represent the quantity of water needed to deliver 90% reliability over the long term (calculated using the methodologies in Schedule 10).
Agri Magic Limited	131.3 & 4	08.05.23C	Support	There needs to be greater clarity about access to the equivalent consenting path and how it works, based on the relevant policies and rules in the Land and Water Regional Plan.
North Canterbury Fish and Game Council	95.37	08.05.23C	Oppose	The loss rate calculated should continue for the life of the consent. In addition, Farm Portal generated loss rates should only be used when they are no longer erroneous.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Ravensdown Limited	114.89	08.05.26	Support	For the reasons given in the original submission.
Ravensdown Limited	114.94	08.05.26	Support	For the reasons given in the original submission. Consistent with Federated Farmers' original submission which was dependent on acceptance of our submission on Table 8-9.
Beef + Lamb New Zealand	214.98	08.05.33	Support	For the reasons given in the original submission.
Waimakariri Next Generation Farmers Trust	425.28	08.06.Table 8a	Support	For the reasons given in the original submission.
DairyNZ Limited	357.69, 70 & 71	08.06.Table 8a	Support	For the reasons given in the original submission.
DairyNZ Limited	357.39	08.06.Table 8b	Support	For the reasons given in the original submission.
Waimakariri Disrict Council	3.29	08.07.01.Table 8-1	Support	For the reasons given in the original submission.
Bowden Environmental	84.24	08.07.01.Table 8-1	Support	For the reasons given in the original submission.
Bowden Environmental	84.25, 26, 27, 28 & 29	08.07.01.Table 8-2	Support	For the reasons given in the original submission.
Waimakariri Next Generation Farmers Trust	425.29	08.07.02.Table 8-4	Support	For the reasons given in the original submission.
Bowden Environmental	84.30	08.07.02.Table 8-4	Support	For the reasons given in the original submission.
DairyNZ Limited	357.38	08.07.03.Table 8-5	Support	For the reasons given in the original submission.
Ballance Agri-Nutrients Limited	441.25 & 52	08.07.03.Table 8-5	Support	For the reasons given in the original submission.
North Canterbury Fish and Game Council	95.47	08.07.03.Table 8-5	Oppose	There is already a great deal of precaution built into Table 8-5.
DairyNZ Limited	357.37	08.07.03.Table 8-6	Support	For the reasons given in the original submission.
Ballance Agri-Nutrients Limited	441.26 & 53	08.07.03.Table 8-6	Support	For the reasons given in the original submission.
DairyNZ Limited	357.40	08.07.03.Table 8-7	Support	For the reasons given in the original submission.
DairyNZ Limited	357.41	08.07.03.Table 8-8	Support	For the reasons given in the original submission.
Beef + Lamb New Zealand	214.102	08.07.03.Table 8-8	Support	For the reasons given in the original submission.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Christchurch City Council	337.168	08.07.03.Table 8-9	Oppose	Oppose increased N discharge reductions and oppose reductions beyond 2030, consistent with our original submission.
North Canterbury Fish and Game Council	95.102	08.07.03.Table 8-9	Oppose	Oppose earlier dates for required N discharge reductions and oppose reductions beyond 2030, consistent with our original submission.
Hinds Drain Working Party	394.16 & 17	13.04.23	Support	For the reasons given in the original submissions.
Eiffelton Community Group Irrigation Scheme	11.5 & 6	13.05.36	Support	For the reasons given in the original submissions.
Adams, M	554.1	General Investigations and Modelling	Support	For the reasons given in the original submission.
Black, L	128.7	Minimum Flows	Oppose	The Flow Regimes as notified are already onerous.
Pearse, H and J	448.2	Minimum flows OFREG regime	Support	Vital for effect management of the water resource.
Black, L	128.5	Nitrate - Reductions	Oppose	Required reductions as notified are already onerous.
Wainono Dairy Ltd	237.14	14.00.11.Map – Fairlie Basin High Nitrogen Concentration Area	Support	For the reasons given in the original submission.
Opuha Water limited	381.9, 10 & 11	14.0 Introduction	Support	For the reasons given in the original submissions.
Ravensdown Limited	114.31	14.04.01	Support	For the reasons given in the original submission.
Opuha Water limited	381.25	14.04.02	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.28	14.04.06	Support	For the reasons given in the original submission.
Opuha Water limited	381.30	14.04.06B	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.30	14.04.06B	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.32	14.04.07	Support	For the reasons given in the original submission. Increases clarity.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Temuka Catchment Working Party	318.79	14.04.08	Support	For the reasons given in the original submission.
New Zealand Deer Farmers Association Canterbury/West Coast and South Canterbury North Otago branches	296.5	14.04.15	Support	For the reasons given in the original submission.
Beef + Lamb New Zealand	214.115 & 116	14.04.15	Support	For the reasons given in the original submissions.
Opuha Water limited	381.50	14.04.20C	Support	For the reasons given in the original submission.
Pye Group	352.32	14.04.21	Support	For the reasons given in the original submission.
Timaru district Council	292.74	14.04.22	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.65 & 66	14.04.30	Support	For the reasons given in the original submission.
Opuha Water limited	381.124	14.04.34	Support	For the reasons given in the original submission.
Opuha Water limited	381.129, 160, 125, 126 & 128	14.04.35	Support	For the reasons given in the original submissions.
Opuha Water limited	381.130, 131, 132 & 133	14.04.36	Support	For the reasons given in the original submissions.
Opuha Water limited	381.135, 136	14.04.37	Support	For the reasons given in the original submission.
Opuha Water limited	381.138	14.04.38	Support	For the reasons given in the original submission.
Opuha Water limited	381.139	14.04.39	Support	For the reasons given in the original submission.
Timaru district Council	292.88	14.04.43	Support	For the reasons given in the original submission.
Timaru district Council	292.89	14.04.44	Support	For the reasons given in the original submission.
Opuha Water limited	381.162	14.04.New	Support	For the reasons given in the original submission.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
DairyNZ Limited	357.50	14.04.New	Support	For the reasons given in the original submission. A rigorous and comprehensive monitoring regime is essential to inform future resource/environmental planning and to inspire confidence in that planning.
Opuha Wate75, r limited	381.36	14.04.New	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.41	14.04.New	Support	For the reasons given in the original submission. Should provide for more effective management of surface flows.
Adaptive Management Working Group (AMWG)	385.29	14.04.New	Support	For the reasons given in the original submission.
Opuha Water limited	381.69, 70, 71, 72, 74, 75 & 76	14.05.12	Support	For the reasons given in the original submissions.
Ulrich, P H	252.9	14.05.17	Support	There is a lack of justification for the High Runoff Risk Phosphorus Zone.
Beef + Lamb New Zealand	214.143	14.04.17	Support	For the reasons given in the original submissions. However, our first choice remains the removal of the High Runoff Risk Phosphorus Zone.
Beef + Lamb New Zealand	214.150	14.04.25	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.140, 141, 142, 143, 144 & 145	14.05.29	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.146	14.05.30	Support	For the reasons given in the original submission.
Opuha Water Limited	381.78, 79 & 80	14.05.31	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.81	14.05.32	Support	For the reasons given in the original submission.
Opuha Water Limited	381.160 & 161	14.05.New	Support	For the reasons given in the original submissions.
Temuka Catchment Working Party	318.48 & 49	14.04.New	Support	For the reasons given in the original submission. Should provide for more effective management of surface flows.
Opuha Water Limited	381.82, 83, 84, 85 & 86	14.06.01.Table 14(a)	Support	For the reasons given in the original submissions.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Opuha Water Limited	381.87, 88, 89, 90, 92 & 93	14.06.01.Table 14(b)	Support	For the reasons given in the original submissions.
Pye Group	352.33	14.06.01.Table 14(c)	Support	For the reasons given in the original submission.
Balance Agri-Nutrients Limited	441.42	14.06.01.Table 14(d)	Support	For the reasons given in the original submission.
DairyNZ Limited	357.65	14.06.01.Table 14(e)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.96	14.06.01.Table 14(f)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.97	14.06.01.Table 14(g)	Support	For the reasons given in the original submission.
Rangitata Dairies Limited Partnership	316.8, 10, 11 & 13	14.06.01.Table 14(g)	Support	The submitter raises valid concerns.
Orari Water Users Group	145.4, 5 & 6	14.06.02.Table 14(h)	Support	For the reasons given in the original submissions.
Temuka Catchment Working Party	318.58	14.06.02.Table 14(j)	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.59	14.06.02.Table 14(k)	Support	For the reasons given in the original submission.
Temuka Catchment Working Party	318.60	14.06.02.Table 14(l)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.98	14.06.02.Table 14(m)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.99	14.06.02.Table 14(m)(m.new)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.100	14.06.02.Table 14(n)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.101	14.06.02.Table 14(o)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.102	14.06.01.Table 14(p)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.103	14.06.02.Table 14(q)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.104	14.06.02.Table 14(r)	Support	For the reasons given in the original submission.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Opuha Water Limited	381.159	14.06.02.Table 14(r)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.105 & 158	14.06.02.Table 14(s)	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.106 & 107	14.06.02.Table 14(u)	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.149	14.06.02.Table 14(v)	Support	For the reasons given in the original submission.
Adaptive Management Working Group (AMWG)	385.16	14.06.02.Table 14(v)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.151 & 161	14.06.02.Table 14(w)	Support	For the reasons given in the original submissions.
Adaptive Management Working Group (AMWG)	385.18	14.06.02.Table 14(x)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.152	14.06.02.Table 14(x)	Support	For the reasons given in the original submissions.
Adaptive Management Working Group (AMWG)	385.16	14.06.02.Table 14(v)	Support	For the reasons given in the original submission.
Opuha Water Limited	381.109 & 110	14.06.02.Table 14(w)	Support	For the reasons given in the original submissions.
Oldfield, M E	134.6	14.06.02.Table 14(z)	Support	For the reasons given in the original submissions.
Temuka Catchment Working Party	318.61	14.06.03.Table 14(zb)	Support	For the reasons given in the original submissions.
Orari Water Users Group	145.8 & 9	14.06.03.Table 14(zb)	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.111 & 112	14.06.03.Table 14(zb)	Support	For the reasons given in the original submissions.
Oldfield, M E	134.7	14.06.03.Table 14(zb)	Support	For the reasons given in the original submissions.
DairyNZ Limited	357.76	14.06.03.Table 14(zc)	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.114	16.06	Support	For the reasons given in the original submission.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Ravensdown Limited	114.23, 24 & 25	16.07	Support	For the reasons given in the original submissions.
Horticulture New Zealand	356.66	16.07	Support	For the reasons given in the original submission.
Water and Wildlife Habitat Trust	88.55, 72 & 74-93	16.07	Oppose	Unduly pedantic and contains many items whose place would be in a plan rather than this schedule. We oppose the new items requested in submissions 88.92 and 88.93.
Royal Forest and Bird Protection Society Inc.	472.210	16.07	Oppose	This should not be a routine requirement.
Royal Forest and Bird Protection Society Inc.	472.211, 212 & 213	16.07	Oppose	It is not the role of farmers to map the items requested.
Royal Forest and Bird Protection Society Inc.	472.214	16.07	Oppose	Council will know whether or not the farm is located within an outstanding landscape. There should not be a requirement to list outstanding natural features – there is a potential problem with even determining what is an outstanding natural feature.
Royal Forest and Bird Protection Society Inc.	472.215	16.07	Oppose	The place for conditions that can be enforced is in a plan. The function on a Farm Environment Plan is quite different, with pressure to comply coming via audit processes.
Ravensdown Limited	114.26	16.07A	Support	For the reasons given in the original submissions.
Barrhill-Chertsey Irrigation Limited	153.26	16.07A	Support	For the reasons given in the original submissions – important to have provisions relevant to commercial vegetable growing..
Ellesmere Sustainable Agriculture Incorporated	207.41	16.08	Support	For the reasons given in the original submission.
DairyNZ Limited	357.46 & 72	16.08	Support	For the reasons given in the original submissions.
Opuha Water Limited	381.115	16.09	Support	For the reasons given in the original submission.
Opuha Water Limited	381.116	16.13	Support	For the reasons given in the original submission.
Dairy Holdings Limited (DHL)	415.6	16.32	Support	For the reasons given in the original submission. Managed Aquifer Recharge (MAR) is a potentially vital tool for managing both water quantity and quality.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Ellesmere Sustainable Agriculture Incorporated	207.45, 42, 43 & 44	16.32	Support in part	Some additional points to consider re – MAR. MAR is a potentially extremely valuable tool. However regard must be had for significant adverse impacts
Royal Forest and Bird Protection Society Inc.	472.197, 198, 199, 200, 201, 202, 203, 204 & 205	16.32	Oppose	The Managed Aquifer Recharge Plan set out in Schedule 32 is sufficient. Some of the submitter's requests are technical in nature and would be necessary in order for the project to be effective e.g. an understanding of the groundwater dynamics. Other matters such as ongoing fish and biodiversity surveys may or may not be needed, depending on context, and are covered in a more general way, e.g. under adverse environmental impacts, in Schedule 32.

Conclusion

Federated Farmers thanks Environment Canterbury for the opportunity to further-submit on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan. We look forward to ongoing dialogue about the plan and continuing to work constructively with Council.

Jason Grant
Chair, Canterbury Regional Policy Committee
President, South Canterbury Province
Federated Farmers of New Zealand