

PROPOSED VARIATION 3 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN

Summary of Decisions Requested Report PROVISION ORDER*

Notified Saturday 4 July 2015

Further Submissions Close Friday 17 July 2015

* Please Note There is an Appendix B To This Summary That Contains Further Submission Points From The Proposed Canterbury Land And Water Regional Plan That Will Be Considered As Submissions To Variation 3. For Further Information Please See Appendix B.

SUMMARY OF DECISIONS REQUESTED GUIDELINES

- 1. This is a summary of the decisions requested by submitters.
- 2. Anyone making a further submission should refer to a copy of the original submission, rather than rely solely on the summary.
- 3. Please refer to the following pages for the ID number of Submitters and Addresses for Service.
- 4. Environment Canterbury is using a new database system to record submissions, this means that the Summary of Decisions Requested will appear different to previous versions. Please use the guide below to understand the coding on the variation.
- 5. Where a submitter has sought an amendment to a provision, this has been deemed, in opposition to that provisions (or part thereof) as notified.

Plan Provision	Point ID	Sub ID	Submitter Name	Support/ Oppose	Summary of Decision Requested
Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	V1pLWRP-1	51901	Mr S Bruerton	Support	Retain Variation 1. Submitter seeks specific measurable items for good management practice, not just undefined statements.

Plan Provision tells you where in the plan the submission point is coded to

Point ID is now the "coding" of the submission point

Submitter ID is now a 5 Digit Number

Table of Abbreviations

7DMALF	Seven-day mean annual low flow
A.M.S.L	Above mean sea level
COMAR	Cultural Opportunity Mapping Assessment and Response
CRC	Canterbury Regional Council
CWMS	Canterbury Water Management Strategy
DIN	Dissolved Inorganic Nitrogen
DOC	Department of Conservation
FEP	Farm Environment Plan
GMP	Good Management Practice
HDI	Hunter Downs Development Company Ltd.
MALF	Mean Annual Low Flow
MGM	The Matrix of Good Management
N	Nitrogen
NARG	Nitrogen Allocation Reference Group
NES	National Environmental Standard
NPSFM	National Policy Statement for Freshwater Management 2014
NRRP	Canterbury Natural Resources Regional Plan
NUG	Nutrient User Group
P	Phosphorus
LWRP / PLWRP / PCLWRP	Proposed Canterbury Land and Water Regional Plan
QMCI	Quantitative Macro-invertebrate Community Index
RMA	Resource Management Act 1991
TLI	Trophic Level Index (a classification system to indicate the health of New Zealand lakes)
TN	Total Nitrogen
TP	Total Phosphorus
WGAZ	Whitneys Creek Groundwater Allocation Zone
WDIS	Waihao Downs Irrigation Ltd.
ZIP	Zone Implementation Programme
ZIP Addendum	Zone Implementation Programme Addendum
Zone Committee	Lower Waitaki-South Coastal Canterbury Zone Committee

SUBMITTERS LIST

Sub ID	Submitter Name	Contact Person	Address
63247	Ballance Agri-Nutrients Limited	Warwick Catto	Private Bag 12 503 Tauranga Mail Centre Tauranga 3143
64125	Beef and Lamb New Zealand Ltd	Matt Harcombe	Ground Floor, Public Trust Building 442 Moray Place Dunedin 9016
53856	Blue Cliffs Station	William Rolleston	PO Box 2117 Timaru 7941
64082	Butlers Fruit Farms Ltd	Donald Butler	335 Lower Hook Road RD 8 Hook Waimate 7978
53274	Central South Island Fish and Game	Jay Graybill and Maree Baker-Galloway	PO Box 150 Canterbury Temuka 7948 and C/- Anderson Lloyd Lawyers PO Box 1959 Dunedin 9054
64076	Community and Public Health	Keith Turner	PO Box 510 Timaru 7940
53683	Dairy Holdings Limited	Ben Williams	C/- Ben Williams Chapman Tripp PO Box 2510 Christchurch 8140
63179	DairyNZ	Tami Woods	c/o PO Box 85066 Lincoln University Lincoln 7647
64080	Daniel Studholme		Te Mako 203 Hakataramea Highway RD 7 Waimate 7977
64099	David Gardner		958 Waihaorunga Back Road RD 7 Waimate 7977
64072	David Linton		2304 Waimate Highway Hook RD 8 Waimate 7978
64095	Department of Conservation	Herb Familton	Department of Conservation Private Bag 4715 Christchurch 8140
64044	Ellis-Lea Farms (2000) Ltd	David Ellis	5 Kellands Hill Road Gleniti New Zealand Timaru 7910
56725	Fertiliser Association of New Zealand	Greg Sneath	PO Box 11519 Manners Street Central Wellington 6142
64090	Fonterra Co-operative Group Limited	Jo Appleyard and Ben Williams	C/- Chapman Tripp PO Box 2510 Christchurch 8140
64135	Goldwyn Angus Limited	Odette and Rob Alexander	871 Teschemaker Valley Road RD 1 Hunter Timaru 7971
52267	Horticulture New Zealand	Chris Keenan	PO Box 10-232 Wellington 6143
64081	Hugh Wigley		Springlands RD 8 Waimate 7978
55552	Hunter Downs Development Company Limited	Richard Timpany	PO Box 418 Timaru 7940
64067	Keith and Christine Adams		28 Bridge Road RD 7 Waimate 7977
64821	L&M Coal Mount Somers Limited	Stephen Calder	C/- Stephen Calder Resource and Environmental Management Limited PO Box 1100 Nelson 7040
64116	Lower Waitaki River Management Society Inc	Francis Whitlock	RD 6H Oamaru 9493
64121	David Sleigh		Waimate Hunter Road RD 8 Waimate 7978
64039	Gary Bruce		181 Willowbridge Road No 10 R D South Canterbury Waimate 7980
64027	Gert van't Klooster		571 Glenavy Tawai Road Waimate 7979
64013	Graham Patterson		41 Mt Nimrod Road RD 14 Cave South Canterbury 7984
64120	Guy Wigley		732 Lower Hook Road RD 8 Waimate 7978
64042	John Gardner		800 Waihaorunga Back Road RD 7 Waimate 7977
64066	John Gregan		RD 1 Timaru 7971
64079	Michael Laming		120 Haymans Road RD 10 Waimate 7980
64046	Tom Hurst		1438 Waimate Highway RD 1 Timaru 7971
64022	Wilma van Leeuwen		63 McNaughtons Road R D 9 New Zealand Waimate 7979
64234	Murphy Farms Ltd	Bruce Murphy	Email Address Only - murphyfarms@xtra.co.nz

Sub ID	Submitter Name	Contact Person	Address
64077	New Zealand Deer Farmers' Association - South Canterbury North Otago Branch	Kelly Bennett	273 McKeown Road RD 21 Geraldine 7991
64073	Ngāi Tahu and Nga Rūnanga	Lynda Murchison	PO Box 13046 Armagh Christchurch 8141
51457	Nitrogen Allocation Reference Group	Lionel Hume	PO Box 414 Canterbury Ashburton 7740
64087	Nutrient Allocation Reference Group - Low Emitters Group	Roger Small	RD 9 Waimate 7979
61382	NZ Pork Industry Board	Anita Murrell	PO Box 4048 Wellington 6140
64011	Oceania Dairy Limited	Shane Lodge	Oceania Dairy Limited PO Box 891 Timaru 7940
64075	Otaio Water User Group	Haidee McCabe	C/- Haidee McCabe PO Box 2193 Washdyke Timaru 7984
56708	Ravensdown Fertiliser Co-operative Limited	Chris Hansen	C/- CHC Ltd PO Box 51-282 Tawa Wellington 5249
64043	Roger and Lisa Small		3405 Main Highway RD 9 South Canterbury Waimate 7979
64143	Rooney Farms Ltd	Richard Draper	PO Box 10 Waimate 7960
64848	South Canterbury Province, Federated Farmers of New Zealand	Lionel Hume	PO Box 414 Ashburton 7740
64084	Willans Holdings / Coastal Farms Ltd	Ian Willans	125 Ben Loch Lane RD 2 Te Anau 9672

Plan Provision	Point ID	Sub ID	Submitter Name	Support/ Oppose	Planner - Summary of Decision Requested
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-18	64022	Wilma van Leeuwen	Oppose	Seeks that ECan consider adjusting the leaching levels in a more economically sustainable level.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-19	64027	Gert van't Klooster	Oppose	Amend the nutrient provisions and tables to accommodate OVERSEER® changes. Updates could occur through a Schedule or by other means, by a group established for this role in agreement with ECan.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-20	64044	Ellis-Lea Farms (2000) Ltd	Oppose	Supports and adopts the general submission points of South Canterbury Province Federated Farmers on Proposed Variation 3 [V3pLWRP-172, 173, 174 and 175]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-109	64073	Ngāi Tahu and Nga Rūnanga	Support	Retain the provisions of Variation 3 as notified except for changes identified in the submission.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-172	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Variation 3 to give effect to the Nitrogen Allocation Reference Group recommendations and to the [Lower Waitaki -South Coastal Canterbury] ZIP Addendum. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)].
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-173	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Replace maximum cap numbers in Variation 3 with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)].
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-174	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Variation 3 to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the Nitrogen Allocation Reference Group recommendations and the ZIP Addendum. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)].
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-175	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Variation 3 to correct modelling errors, to accommodate S-map updates and align modelled estimates with on-farm estimates of N loss. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)].
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-176	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Align Variation 3 with the Nutrient Management Variation (which will incorporate Matrix of Good Management (MGM) N loss benchmarks and good management practices into the LWRP) to enable the incorporation of MGM benchmarks and practices into Variation 3.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-177	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Hold a meeting in accordance with Section 8AA of the 1st Schedule of the RMA for the purpose of clarifying and facilitating resolution of the matters raised in submission points V3pLWRP-172, 173, 174,175 and 176, prior to the hearing.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-272	52267	Horticulture New Zealand	Oppose	Amend soil maps and recalculate nutrient limits based on revised data set.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal	V3pLWRP-273	52267	Horticulture New Zealand	Oppose	Amend Variation 3 so that all numbers, including limits and targets, N loads, flexibility caps and maximum caps to be adjusted to match new versions of OVERSEER® .

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Canterbury					Ensure that there is adequate flexibility in the use of OVERSEER® given the limitations associated with its use.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-274	52267	Horticulture New Zealand	Oppose	Amend and completely review the Variation once the MGM project is complete, ensure that the use of MGM is both reasonable and practical and consistent with the new versions of OVERSEER® .
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-279	52267	Horticulture New Zealand	Oppose	Include in the Section 32 discussion on the issue of protecting root stock of permanent horticulture (Crop Survival Water). [Submission point relates to submission points ID V3pLWRP-275, V3pLWRP-276, V3pLWRP-277 and V3pLWRP-278]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-282	52267	Horticulture New Zealand	Oppose	Amend Variation 3 to be consistent with the 'solution package' in the ZIP Addendum and NARG allocation framework.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-355	53274	Central South Island Fish and Game	Oppose	Amend provisions to ensure they include that the life supporting capacity of water, soil and ecosystems are safeguarded.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-356	53274	Central South Island Fish and Game	Oppose	Seeks that Fish and Game waterbody values be identified at least in accordance with Schedule 3 [to the RMA] water quality classes. [See full submission for detail].
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-357	53274	Central South Island Fish and Game	Oppose	Seeks new Table/provisions that identifies values of waterbodies. The following values, as a minimum, should be included in Variation 3: <ul style="list-style-type: none"> • Aesthetic values • Native fish values including inanga spawning • Trout fishery and spawning values • Game bird habitat • Native bird habitat • Riparian habitat <p>These values should be identified ideally to the river, stream, or where appropriate reach level; however, if this is not achievable, the values should be identified to the sub-catchment level.</p>
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-358	53274	Central South Island Fish and Game	Oppose	Seeks that the Variation identifies contact recreation sites in relation to the regional salmonids fishery and include these as "contact recreational sites," incorporate numerical water quality and quantity limits to protect these values, and include rules in relation to those identified water which must ensure the standards set out in Schedule 3 [to the RMA] are complied with.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-360	53274	Central South Island Fish and Game	Oppose	Seeks that the Variation includes provisions that preserve the natural character of the coastal environment, wetlands, and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-391	64082	Butlers Fruit Farms Ltd	Oppose	Insert a method for determining nitrogen load for orchards that is fair and robust or exclude Orchards from having to comply with these rules [as submitter considers that OVERSEER® has no ability to determine a nitrogen loss for orchards]. [Submission point lodged against policies 15.3, 15.4.1, - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(c), 15(m) - (p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-392	64082	Butlers Fruit Farms Ltd	Oppose	Seeks that all farms use good practice and undertake Farm Environmental Plans, in order to not only address surface water quality but shallow groundwater quality as well. [Submission point lodged against policies 15.3, 15.4.1, - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(c), 15(m) - (p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal	V3pLWRP-393	64082	Butlers Fruit Farms Ltd	Oppose	Submitter supports the outcomes sought by NARG [Nitrogen Allocation Reference Group] submission to bring in a fair, scientifically robust, flexible and financially viable nutrient management policies and rules.

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Canterbury					[Submission point lodged against policies 15.3, 15.4.1, - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(c), 15(m) - (p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-398	53683	Dairy Holdings Limited	Oppose	Seeks that the provisions and load limits within Variation 3 be revisited and updated in light of the Matrix of Good Management (MGM) and for any reductions in nitrogen loss rates (and timings of those reductions) to be reviewed once the outcomes of the MGM project are known. If the MGM is available in time, the final provisions of Variation 3 should be considered in light of the MGM project outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-399	63179	DairyNZ	Oppose	Dairy NZ strongly encourages the Council to look at aligning the two planning processes [Nutrient Management Plan Change to introduce the Matrix of Good Management and Variation 3] and delay the hearing of Variation 3 so as to hear the two planning processes together.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-402	53683	Dairy Holdings Limited	Oppose	Delete reference to "Nutrient User Group" throughout Variation 3. [See consequential changes to Policies 15.4.10, 15.4.11, 15.4.12 and 15.4.13]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-415	53683	Dairy Holdings Limited	Oppose	Provide for a rule to the effect that if OVERSEER® is updated, the most recent version can be used to both: (a) re-calculate any N-loss limit/load (including nitrogen baseline) described in a plan provision; and (b) assess compliance against the re-calculated N-loss limit/load (including the nitrogen baseline) In both cases it would be a condition of the rule that the same input data would be used.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-416	53683	Dairy Holdings Limited	Oppose	In addition to the specific and (general) relief set out in Dairy Holdings Limited submissions, submitter seeks such other further and alternative relief that addresses all of the concerns/issues set out. In this respect, Dairy Holdings Limited submission should be read as applying to, and to the extent necessary opposing, all of Variation 3 and not just the specific relief sought in the table that is Annexure 2 to the submission.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-421	64072	David Linton	Oppose	Seeks a review of the load calculation. [Submitter notes they oppose the current load limit for the Wainono Catchment]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-422	64072	David Linton	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-424	64072	David Linton	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing development and flexibility in farm management.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-425	64072	David Linton	Oppose	Seeks for the Variation to provide for future N allocation to low emitters (below 17kgN/Ha) allowing flexibility for ongoing development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-479	64075	Otaio Water User Group	Oppose	Seeks ECan Investigating Officers who process consents to test a number of scenarios to ensure the plan gives effect to its intent. If it does not, amend the plan provisions to ensure the plan functions as intended.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-608	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Opposes nutrient allocation approach, seeks a modified equal allocation for Waihao-Wainono and Northern Streams catchments.
Proposed Variation 3 to the Proposed	V3pLWRP-616	64077	New Zealand Deer Farmers'	Oppose	Seeks clarification on the implications on business or individuals who choose not be part of an Irrigation Scheme or a newly formed Nutrient User

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Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury			Association South Canterbury North Otago Branch		Group.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-619	64079	Michael Laming	Oppose	Seeks that a defined term is used for 'waterway'.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-625	64046	Tom Hurst	Oppose	Opposes Variation 3 - No specific decision requested.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-676	64027	Gert van't Klooster	Oppose	Amend Variation 3 by taking into account real soil mapping and sampling to compare water holding capacity of soil in situ against the figures that are used in the model Nutrient Budgets which is used to create the N loss load limits in Table 15(p). Use GIS over lay S-maps to determine specific areas of the different soils in the catchment.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-677	64027	Gert van't Klooster	Oppose	Seek alternative modelling without augmentation of Wainono Lagoon and the effects on the current and future Nitrogen allocation.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-678	64027	Gert van't Klooster	Oppose	Amend Variation 3 by allowing the different nutrient loads in each Zone to be averaged across the zones.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-679	64027	Gert van't Klooster	Oppose	Amend Variation 3 by allowing Farming Enterprise to cover more than one Zone, and if those loads are different these are averaged.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-712	64234	Murphy Farms Ltd	Oppose	Supports the submission by the Nitrogen Allocation Reference Group (NARG).
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-713	64234	Murphy Farms Ltd	Oppose	Supports the submission by the Otaio Water Users Group.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-715	64234	Murphy Farms Ltd	Oppose	Supports the submission by Federated Farmers.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-717	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Seeks for the Vision of the CWMS to be given particular regard to when making a decision on the provisions of Variation 3.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-726	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-727	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management - no decision requested.

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Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-728	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-729	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-732	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	For stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-734	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Seeks for Council to:</p> <ul style="list-style-type: none"> • Ensure the outcomes and intentions of the ZIP to be clearly followed through into the provisions of Variation 3, as sought below in specific submission points; • Provide a clear statement to be included in Variation 3 that outlines the process by which the GMP numbers that result from the MGM Project will be incorporated into Variation 3 to replace the current flexibility cap and maximum cap numbers; • Review the policy and rule regime to introduce a simplistic framework to implement the limits set.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-735	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Seeks the Council to:</p> <ul style="list-style-type: none"> • Review of the regulatory approach developed in Variation 3 to better reflect the intentions of the ZIP; • Include a mechanism within Variation 3 to incorporate GMP numbers once the findings of MGM Project are available; • Review the complex nutrient management regime adopted in Variation 3; • If a review is rejected, re-evaluate the economic costs and benefits of the complex regime currently included in Variation 3. <p>[See full submission for detail of concerns including robustness of the section 32 assessment in relation to nitrogen limits.]</p>
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-736	64125	Beef and Lamb New Zealand Ltd	Oppose	Seeks reconsideration of how the variation gives effect to the recommendations of the Nitrogen Allocation Reference Group.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-741	64067	Keith and Christine Adams	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-742	64067	Keith and Christine Adams	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-743	64067	Keith and Christine Adams	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-744	64067	Keith and Christine Adams	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-746	64067	Keith and Christine Adams	Oppose	For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.

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Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-747	64067	Keith and Christine Adams	Oppose	Opposes nutrient allocation approach, seeks a modified equal allocation for Waihao-Wainono Northern Streams catchment.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-753	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Seeks for Council to: <ul style="list-style-type: none"> • Change the activity status that apply to the use of land for farming activities that exceed the nitrogen baseline, flexibility cap from prohibited to non-complying Activity; • Delete all provisions in Variation 3 that incorporates a maximum cap mechanism; and • Ensure the relevant policies identify the importance of the nitrogen baseline in the rule regime.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-754	64135	Goldwyn Angus Limited	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-755	64135	Goldwyn Angus Limited	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-756	64135	Goldwyn Angus Limited	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-757	64135	Goldwyn Angus Limited	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-759	64135	Goldwyn Angus Limited	Oppose	For stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-761	64135	Goldwyn Angus Limited	Oppose	Opposes nutrient allocation approach, seeks a modified equal allocation for Waihao-Wainono Northern Streams catchment.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-778	64121	David Sleigh	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-779	64121	David Sleigh	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-780	64121	David Sleigh	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-781	64121	David Sleigh	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.

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Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-786	64125	Beef and Lamb New Zealand Ltd	Oppose	Seeks a recalculation of the total catchment load based on achieving water quality outcomes in the receiving environment. Only use the latest version of OVERSEER® to inform relative progress towards achievement of individual nitrogen discharge limits.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-788	64121	David Sleigh	Oppose	For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-791	64125	Beef and Lamb New Zealand Ltd	Oppose	Amend the soils data and recalculate the [nitrogen] load and allocation based on correct soil data.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-792	64125	Beef and Lamb New Zealand Ltd	Oppose	Seeks that the Variation provides greater flexibility to low nitrogen loss activities in the allocation method - including providing a permitted activity (with adoption of Farm Environment Plans) to all activities with a nitrogen baseline below 15kgN/Ha. This can be achieved over time through providing for a transition state between current baseline and future state.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-795	64125	Beef and Lamb New Zealand Ltd	Oppose	Seeks a delay to the hearing of the submissions on Variation 3 until the adoption of a region wide Variation that incorporates new information determined by the Matrix of Good Management project.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-797	64120	Guy Wigley	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-798	64120	Guy Wigley	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management - no decision requested.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-799	64120	Guy Wigley	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-800	64120	Guy Wigley	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-802	64120	Guy Wigley	Oppose	For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-803	64120	Guy Wigley	Oppose	Opposes nutrient allocation approach, seeks a modified equal allocation for Waihao-Wainono Northern Streams catchment.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-809	64042	John Gardner	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal	V3pLWRP-810	64042	John Gardner	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management

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Canterbury					
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-811	64042	John Gardner	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-814	64042	John Gardner	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-817	64042	John Gardner	Oppose	For stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-818	64042	John Gardner	Oppose	Opposes nutrient allocation approach and seeks a modified equal allocation.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-819	64042	John Gardner	Oppose	Amend the Nutrient Allocation Zones by separating Waihao-Wainono area into two areas - Waihao and Wainono.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-831	64080	Daniel Studholme	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-832	64080	Daniel Studholme	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-833	64080	Daniel Studholme	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-834	64080	Daniel Studholme	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-836	64080	Daniel Studholme	Oppose	For stable low emission farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-841	64099	David Gardner	Oppose	Seeks a review of the load calculation to focus on priorities for achieving water quality outcomes.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-842	64099	David Gardner	Oppose	Seeks for the Variation to provide flexibility to allow for ongoing routine development and flexibility in farm management - no specific decision requested.
Proposed Variation 3 to the Proposed	V3pLWRP-843	64099	David Gardner	Oppose	Seeks for the Variation to provide for future N allocation to low emitters allowing flexibility for ongoing routine development.

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Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury					
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-844	64099	David Gardner	Oppose	Seeks that Variation 3 provides for transition times before allocation framework applies to allow for existing water consent holders to finish small scale irrigation infrastructure development.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-846	64099	David Gardner	Oppose	For stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-851	51457	Nitrogen Allocation Reference Group	Oppose	Amend Variation 3 to give effect to the NARG recommendations and to the [Lower Waitaki -South Coastal Canterbury] ZIP Addendum. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-852	51457	Nitrogen Allocation Reference Group	Oppose	Replace maximum cap numbers in Variation 3 [Table 15(n)] with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-853	51457	Nitrogen Allocation Reference Group	Oppose	Amend Variation 3 to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the Nitrogen Allocation Reference Group and the ZIP Addendum. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-854	51457	Nitrogen Allocation Reference Group	Oppose	Amend Variation 3 to correct modelling errors, to accommodate S-map updates and align modelled estimates with on-farm estimates of N loss. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-855	51457	Nitrogen Allocation Reference Group	Oppose	Align Variation 3 with the Nutrient Management Variation (which will incorporate Matrix of Good Management (MGM) N loss benchmarks and good management practices into the LWRP) to enable the incorporation of MGM benchmarks and practices into Variation 3.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-856	51457	Nitrogen Allocation Reference Group	Oppose	Hold a meeting in accordance with Section 8AA of the 1st Schedule of the RMA for the purpose of clarifying and facilitating resolution of these matters, prior to the hearing.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-857	64066	John Gregan	Oppose	Supports the submission of the Nitrogen Allocation Reference Group and its suggested changes to Variation 3.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-858	64143	Rooney Farms Ltd	Oppose	Amend Variation 3 to give effect to the Nitrogen Allocation Reference Group recommendations and to the [Lower Waitaki -South Coastal Canterbury] ZIP Addendum. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-859	64143	Rooney Farms Ltd	Oppose	Replace maximum cap numbers in Variation 3 with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]

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Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-861	64143	Rooney Farms Ltd	Oppose	Amend Variation 3 to enable N loads, flexibility caps and maximum caps to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the Nitrogen Allocation Reference Group and the ZIP Addendum. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-862	64143	Rooney Farms Ltd	Oppose	Amend Variation 3 to correct modelling errors, to accommodate S-map updates and align modelled estimates with on-farm estimates of N loss. [Submitter opposes the nutrient management provisions of Variation 3 including Policies 15.4.1 - 15.4.17, Rules 15.5.1 - 15.5.14 and Tables 15(m) - 15(p)]
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-863	63179	DairyNZ	Oppose	Supports and adopts the Nitrogen Allocation Reference Group (NARG) submission.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-878	64013	Graham Patterson	Oppose	Seeks that low emitter systems are not locked into low nitrogen rates in perpetuity.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-881	64013	Graham Patterson	Oppose	Seeks that Variation 3 be amended to ensure: <ul style="list-style-type: none"> the process including the Nutrient User Groups has representation from ALL sectors of the farming community costs are not prohibitive to farming operations data and science are robust and reliable sensible and appropriate time frames.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-963	64081	Hugh Wigley	Oppose	Supports the submission of South Canterbury Province of Federated Farmers in its entirety.
Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan - Section 15- Waitaki and South Coastal Canterbury	V3pLWRP-1015	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend the provisions for irrigation schemes included in Variation 3 to be consistent with the provisions contained in Variations 1 and 2 to the proposed Land and Water Regional Plan.
15.6.2 Groundwater Limits Table 18 - Waitaki Groundwater Limits	V3pLWRP-2	64011	Oceania Dairy Limited	Oppose	Reinstate original title for Table 18 by not striking out the text "...and South Canterbury Coastal...". [Submitter put relief sought against provision 15.6.3 which is assumed to be a typographical error as submitter refers to Table 18 which is located under 15.6.2]
South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-4	64011	Oceania Dairy Limited	Oppose	Amend introductory text on page 15-2. Rephrase the sentence "in catchment water use is at or beyond sustainable limits for both surface and groundwater..." as submitter states this is incorrect because the WAGZ is not over allocated [assume WAGZ to be Whitneys Groundwater Allocation Zone].
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-22	64044	Ellis-Lea Farms (2000) Ltd	Oppose	Supports and adopts the submission of South Canterbury Province Federated Farmers on Section 15A (introductory text through to and including Policies).
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-110	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Section 15A as follows: Due to the lack of in-catchment water The freshwater resources within the catchment cannot supply the demand for irrigation...
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-115	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Section 15A, paragraph 3, bullet point six as follows: Capping current water allocation and reducing phasing out over-allocation by reducing the quantum of water able to be abstracted from over-allocated resources, and enabling alternative supplies such as new irrigation scheme water, on-farm storage and, where appropriate, deep groundwater. over time as new water sources are available and irrigation efficiency improves, enabling a alternative sources of water, and signalling a

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					<p>future date for higher flows to be implemented</p> <p><u>Increasing environmental flows in over-allocated rivers and streams over time.</u></p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-178	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend the second paragraph in Section 15A, page 15-2 to accurately summarise the balance between land use, water flow and allocation, and water quality in the three sets of catchments covered by Variation 3.
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-179	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend the second paragraph in Section 15A on page 15-3 to be consistent with the ZIP Addendum and emphasise the importance of achieving good management practice as defined by the Matrix of Good Management.
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-206	63179	DairyNZ	Oppose	<p>Insert two new paragraphs to the introductory narrative between the first and second paragraphs on page 15-3 as follows:</p> <p><u>The Lower Waitaki Coastal South Canterbury Area that is addressed in this section includes a diverse range of farming, industrial and township based activities. The sub-region is of significant economic, social and cultural importance to the wider Canterbury and Otago Regions.</u></p> <p><u>The South Coastal Canterbury area is an important area for agriculture and food production which provides significant employment, both on farm and in processing and service industries. The social and economic well-being of the community is reliant on the agricultural industry and associated processing and it is important that it is retained so that the community can thrive</u></p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-281	52267	Horticulture New Zealand	Oppose	<p>Amend Section 15A Introduction by adding a new paragraph as follows:</p> <p><u>The South Coastal Canterbury Area is an important area for agricultural and food production which provides significant employment in the area, both on-farm and in processing and service industries. The social and economic wellbeing of the community is reliant on the agricultural industry and it is important that it is retained so that the communities can thrive.</u></p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-417	64095	Department of Conservation	Oppose	<p>Amend Section 15A introductory text as follows:</p> <ul style="list-style-type: none"> • Insert discussion on the recreational and historic values of the Wainono Lagoon on page 15-1. • An explanation on p15-2 of the role of historic significance and critical role the Waihao Box plays. • Insert a key to Map 2 on page 15-2. • Insert " <u>from the lower Waitaki River</u> " to the last paragraph on page 15-2 after "out-of-catchment water is accessible". <p>Amend Paragraph 1 on page 15-4 of the Variation by, noting DOC as manager of the Wainono Conservation Area has not formally agreed to the proposal to augment surface flows into the lagoon. Also the paragraph should discuss the potential effects of didymo and glacial silt being introduced into the Lagoon and tributaries and appropriate mitigating measures.</p> <p>Insert the following bullet to Paragraph 3 page 15-3 to give effect to ZIP addendum recommendation 1.1, page 6:</p> <ul style="list-style-type: none"> • <u>Identification and protection of remnant Canterbury mudfish populations</u>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-481	64075	Otaio Water User Group	Oppose	Clarify where in the plan 90% level of protection is transformed to a numerical limit.
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-617	64079	Michael Laming	Oppose	<p>Amend Section 15A introduction with the following sentence:</p> <p><u>It should be noted that land drainage is of great value to maintain the land as productive farm land.</u></p> <p>The Waihao Box should be mentioned as a unique feature in this catchment, as a valuable asset to the community and its success at providing land drainage.</p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-626	64090	Fonterra Co-operative Group Limited	Oppose	<p>Insert two new paragraphs to the introductory narrative between the first and second paragraphs on page 15-3) as follows:</p> <p><u>The Lower Waitaki Coastal South Canterbury Area that is addressed in this section includes a diverse range of farming, industrial and township based</u></p>

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					<p><u>activities. The sub-region is of significant economic, social and cultural importance to the wider Canterbury and Otago Regions.</u></p> <p><u>The South Coastal Canterbury area is an important area for agriculture and food production which provides significant employment, both on farm and in processing and service industries. The social and economic well-being of the community is reliant on the agricultural industry and associated processing and it is important that it is retained so that the community can thrive</u></p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-865	64084	Willans Holdings / Coastal Farms Ltd	Oppose	<p>Submitter supports South Canterbury Province Federated Farmers submission</p> <p>[see submission point V3pLWRP 178].</p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-960	64116	Lower Waitaki River Management Society Inc	Oppose	Amend some targets to "limits" or "standards"
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-961	64116	Lower Waitaki River Management Society Inc	Oppose	<p>Amend the Variation so that the Human Health for Recreation Indicator provides for a level of faecal coliforms that is suitable for contact recreation and not just wading.</p> <p>[Table 15(b) sets the Human Health Indicator to be suitable for wading. Note that the submitter has not specified where this amendment is to take place, and that amending the <i>E.coli</i> limit specified in Table 15(b) may require consequential amendments]</p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-962	64116	Lower Waitaki River Management Society Inc	Oppose	Amend the Variation to include landuse planning at catchment scale with the emphasis on land management practices that better capture and harvest water where it falls (in preference to bulk water transfer) and capture and build carbon in the soil for multiple benefits, including farming systems which are more stable and resilient to climate change.
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-970	64076	Community and Public Health	Support	Retain the use of Farm Environment Plans and Good Management Practice as stated in Section 15A
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-971	64076	Community and Public Health	Support	<p>Retain the aim as stated in Section 15A to maintain a minimal protection level of 90% for nitrate toxicity in streams.</p> <p>Include a staged implementation approach with sufficient monitoring to ensure stream nutrient levels remain with those set by the plan.</p>
A South Coastal Canterbury Sub-regional Area 15A	V3pLWRP-1014	64116	Lower Waitaki River Management Society Inc	Oppose	<p>The submitter states their intention to provide specific alternatives to the provisions in Variation 3 for the hearing and raises concerns on several topics and considers (among other things) that there is a risk the Variation contains insufficient controls to meet national and regional freshwater objectives.</p> <p>[See full submission for details]</p>
South Coastal Canterbury Definitions 15.1	V3pLWRP-17	64013	Graham Patterson	Oppose	Insert a new definition of "Intensively farmed stock"
South Coastal Canterbury Definitions 15.1	V3pLWRP-113	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete the definition of 'existing farming activity'</p> <p>[Submitter seeks to replace with a new definition of "Change in Land Use" - see Submission Point ID V3pLWRP-117]</p>
South Coastal Canterbury Definitions 15.1	V3pLWRP-114	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete the definition of 'new farming activity'</p> <p>[Submitter seeks to replace with a new definition of "Change in Land Use" - see Submission Point ID V3pLWRP-117]</p>
South Coastal Canterbury Definitions 15.1	V3pLWRP-116	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete the definition of "augmentation".
South Coastal Canterbury Definitions 15.1	V3pLWRP-117	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Insert a new definition as follows:</p> <p><u>Change of land use</u></p> <p><u>any increase in the area of land irrigated on a property; or any increase in the area of land under cultivation; or any increase in the number of weaned cattle grazed on the property; or any increase in the amount of effluent, sewage, bio solids or other organic material spread or otherwise disposed of on a site; but does not include any of these activities where they have been authorised by a resource consent issued prior to 01 May 2015 where that resource consent has not yet been given effect to but has not lapsed.</u></p> <p>[See Submission Point ID V3pLWRP-113 and V3pLWRP-114]</p>

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South Coastal Canterbury Definitions 15.1	V3pLWRP-118	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete the definition of "nitrogen baseline".
South Coastal Canterbury Definitions 15.1	V3pLWRP-119	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend the definition of "Wainono Restoration Project" as follows: means a works programme carried out by or on behalf of or in partnership with a local authority <u>or Te Rūnanga o Waihao or Te Rūnanga o Ngāi Tahu</u> ...
South Coastal Canterbury Definitions 15.1	V3pLWRP-180	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Insert a new definition for Surface drain as follows: <u>Surface drain: includes any open channel, artificial watercourse constructed for the purpose of land drainage, excluding storm-water swales, or other artificial watercourses that are ephemeral in nature.</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-181	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain the definition of "Nutrient User Group" as notified.
South Coastal Canterbury Definitions 15.1	V3pLWRP-207	63179	DairyNZ	Oppose	Delete the definition of "existing farming activity". [a consequence of decision requested in relation to submission points V3pLWRP-218 and V3pLWRP-224]
South Coastal Canterbury Definitions 15.1	V3pLWRP-218	63179	DairyNZ	Oppose	Delete the definition of “new farming activity”. [a consequence of decision requested in relation to submission points V3pLWRP-207 and V3pLWRP-224]
South Coastal Canterbury Definitions 15.1	V3pLWRP-224	63179	DairyNZ	Oppose	Insert a new definition for “Individual Farming Activity”as follows [to simplify Rule 15.5.2 in particular]: <u>Individual farming activity means a farming activity undertaken on land that is not part of a Nutrient Management Group or Farming Enterprise nor a property that is supplied with water by an irrigation scheme.</u> [a consequence of decision requested in relation to submission points V3pLWRP-207 and V3pLWRP-218]
South Coastal Canterbury Definitions 15.1	V3pLWRP-276	52267	Horticulture New Zealand	Oppose	Insert a definition of “Rootstock and Crop survival water” as follows: <u>Water provided for the protection of root stock of permanent horticulture, and protection of crops, excluding pasture species, animal fodder crops and maize through a reliability standard set at 100%.</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-283	52267	Horticulture New Zealand	Oppose	Amend the definition of "Access to an Irrigation Scheme" as follows: an irrigation scheme has developed to a stage where the land is able to be supplied with water.
South Coastal Canterbury Definitions 15.1	V3pLWRP-284	52267	Horticulture New Zealand	Oppose	Amend the definitions for "Existing farming activity" and "New farming activity" by recognising crop rotation as follows: Existing farming activity means a farming activity in existence on the property at 1 May 2015 <u>and includes the full rotational cropping systems and use of parts of the farm for crops that are part of the farming activity undertaken on the property</u> .
South Coastal Canterbury Definitions 15.1	V3pLWRP-285	52267	Horticulture New Zealand	Support	Retain the definition of “Nutrient User Group”.
South Coastal Canterbury Definitions 15.1	V3pLWRP-286	52267	Horticulture New Zealand	Oppose	Amend the definition of “Flexibility cap” as follows: means the allowable nitrogen loss rate in an area as set out in Table 15(m) <u>, adjusted following release of updated OVERSEER® version</u> .
South Coastal Canterbury Definitions 15.1	V3pLWRP-288	52267	Horticulture New Zealand	Oppose	Amend the definition of "Maximum cap" as follows: means the maximum nitrogen loss rate allowed for the listed soil type in Table 15(m) <u>, adjusted following release of updated OVERSEER® version.</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-397	53683	Dairy Holdings Limited	Oppose	Insert a new definition of “ <u>good management practice</u> ” with reference to the Matrix of Good Management Practice project will inform it within the

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					current Schedule 1 process or undertake a further Schedule 1 process where the cost and benefits can be properly assessed. [Submitter notes Policy 15.4.4 refers to 'good management practice' but this is not defined within Variation 3 or the pLWRP].
South Coastal Canterbury Definitions 15.1	V3pLWRP-400	53683	Dairy Holdings Limited	Oppose	Delete the definition of "Nutrient User Group" and revert to the use of the "Farming Enterprise" regime contained in the pLWRP.
South Coastal Canterbury Definitions 15.1	V3pLWRP-426	53856	Blue Cliffs Station	Oppose	Insert a new definition for "Irrigation schemes". [No definition given in submission]
South Coastal Canterbury Definitions 15.1	V3pLWRP-427	53856	Blue Cliffs Station	Oppose	Insert a new definition for "Farming Enterprise" as follows: <u>means a group of contiguous properties in the same or related ownership and within the same catchment which operates as a single enterprise for the purposes of nutrient management.</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-439	64095	Department of Conservation	Oppose	Amend definition of "Augmentation" by replacing the word "better" with "lower" as follows: "...sustaining a TLI of 6.0 or better <u>lower</u> in the Wainono Lagoon."
South Coastal Canterbury Definitions 15.1	V3pLWRP-440	64095	Department of Conservation	Oppose	Amend the definition of "Wainono Restoration Project" as follows: "means a work programme carried out by or on behalf of or in partnership with a local authority, <u>Waihao Rūnanga, Ngai Tahu, Fish and Game, and Department of Conservation</u> for the purposes of..."
South Coastal Canterbury Definitions 15.1	V3pLWRP-482	64075	Otaio Water User Group	Support	Retain the definitions as notified.
South Coastal Canterbury Definitions 15.1	V3pLWRP-609	64077	New Zealand Deer Farmers' Association South Canterbury North Otago Branch	Oppose	Replace Table 15(m) with Table 15(n) in the definition for Maximum Cap.
South Coastal Canterbury Definitions 15.1	V3pLWRP-627	64090	Fonterra Co-operative Group Limited	Oppose	Delete the definition of "existing farming activity".
South Coastal Canterbury Definitions 15.1	V3pLWRP-628	64090	Fonterra Co-operative Group Limited	Oppose	Delete the definition of "new farming activity".
South Coastal Canterbury Definitions 15.1	V3pLWRP-629	64090	Fonterra Co-operative Group Limited	Oppose	Insert a new definition for Individual Farming Activity as follows [to simplify Rule 15.5.2 in particular]: <u>"Individual farming activity" means a farming activity undertaken on land that is not part of a Nutrient Management Group or Farming Enterprise nor a property that is supplied with water by an irrigation scheme.</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-635	63247	Ballance Agri-Nutrients Limited	Support	Amend the definition of "Flexibility cap" to better explain the mechanism and the relationship with "Nitrogen baseline" and Maximum cap" Or Delete definition "Flexibility cap" and provide explanation in the policies and rules (or similar effect). [submitter has not requested specific amendments to the rules or policies in lieu of the Flexibility cap definition, but has requested any consequential amendments]
South Coastal Canterbury Definitions 15.1	V3pLWRP-680	61382	NZ Pork Industry Board	Oppose	Retain the definition of "Existing farming activity" in section 15.1 as notified.
South Coastal Canterbury Definitions 15.1	V3pLWRP-681	61382	NZ Pork Industry Board	Oppose	Amend the definition of "Flexibility cap" as follows: "nitrogen loss rate" <u>"nitrogen loss calculation"</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-682	61382	NZ Pork Industry Board	Oppose	Delete definition and all references to "Maximum cap" because this cannot be defined as the only available tools have a margin of error of up to 30%.

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South Coastal Canterbury Definitions 15.1	V3pLWRP-688	63247	Ballance Agri-Nutrients Limited	Oppose	Amend definition of "Maximum cap" to refer to Table 15(n)
South Coastal Canterbury Definitions 15.1	V3pLWRP-689	63247	Ballance Agri-Nutrients Limited	Oppose	Amend the definition of "Nitrogen baseline" as follows (or similar): "means the definition set out in section 2.9, except <u>that for the purposes of this section Section 15A, the nitrogen baseline applies separately to that area of land that is entirely located within the a nitrogen baseline may only be established for areas of land that are located entirely within the Northern Streams Hill or Northern Streams Plains or the Waihao-Wainono Plains of Waihao-Wainono Hill Area-areas ...</u> "
South Coastal Canterbury Definitions 15.1	V3pLWRP-699	56725	Fertiliser Association of New Zealand	Support	Amend definition of "Maximum cap" to refer to Table 15 (m) (n)
South Coastal Canterbury Definitions 15.1	V3pLWRP-700	56725	Fertiliser Association of New Zealand	Oppose	Amend definition of "New farming activity" as follows: <u>"this excludes routine rotational land use activity within a Farming Enterprise, Nutrient User Group or Irrigation Scheme when there is no significant increase in land area used for that activity within a catchment".</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-701	56725	Fertiliser Association of New Zealand	Oppose	Insert a definition for "Load".
South Coastal Canterbury Definitions 15.1	V3pLWRP-768	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Insert a new definition for 'farming activity' as follows (or similar): <u>"Farming activity" means the use of land for the production of primary products including agricultural, pastoral, horticultural and forestry products.</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-769	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend the definition of "Existing farming activity" by adding the following (or similar): <u>"...and includes all activities undertaken during the period of period 01 July 2009 – 30 June 2013 whether seasonal or rotational."</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-770	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend the definition of "new farming activity" by adding the following (or similar): <u>"...this excludes routine rotational land use activity within a Farming Enterprise, Nutrient User Group or Irrigation Scheme when there is no significant increase in land area used for that activity within a catchment"</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-771	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend the definition of "flexibility cap" as follows: <u>"...as modelled with OVERSEER® TM, or equivalent model approved by the Chief Executive of Environment Canterbury. If OVERSEER® TM is updated, the most recent version is to be used."</u>
South Coastal Canterbury Definitions 15.1	V3pLWRP-772	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Delete the definition "Maximum cap".
South Coastal Canterbury Definitions 15.1	V3pLWRP-773	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Insert a new definition of "nitrogen loss calculation" that applies specifically to the four areas in order to be consistent with the nitrogen baseline definition amendment.
South Coastal Canterbury Definitions 15.1	V3pLWRP-813	64125	Beef and Lamb New Zealand Ltd	Oppose	Amend the definition of "Nitrogen Baseline" to [be the] maximum of a five year period and calculated over a 5 year rolling average. [unclear whether the submitter is seeking to amend the regional definition of "nitrogen baseline" in section 2.9 or section 15.1 of the pLWRP]
South Coastal Canterbury Definitions 15.1	V3pLWRP-822	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Insert a definition of "surface water allocation zone".
South Coastal Canterbury Definitions 15.1	V3pLWRP-1006	64090	Fonterra Co-operative Group Limited	Oppose	Insert definition "industrial or trade process wastewater system".
Other Regional Plans that Apply to the South Coastal Canterbury Sub-regional Area 15.2.1	V3pLWRP-441	64095	Department of Conservation	Oppose	Insert the following plans under Other Regional Plans: 1. <u>Regional Coastal Environment Plan</u> 2. <u>Land and Vegetation Management Plan</u> (whilst still operative) 3. <u>Natural Resources Regional Plan</u> (whilst still operative)

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Iwi Management Plans that Apply to the South Coastal Canterbury Area 15.2.2	V3pLWRP-120	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Add the following reference in the Iwi Management Plan section :</p> <p><u>Te Whakatau Kaupapa - Resource Management Strategy for Canterbury</u></p> <p>Amend the Iwi Management Plan section as follows:</p> <p>Te Rūnanga o Ngāi Tahu Freshwater Policy Statement 1999</p>
Freshwater Outcomes 15.3	V3pLWRP-122	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Add the following freshwater outcomes to Section 15.3:</p> <ul style="list-style-type: none"> <u>The water quality in the Waihao-Wainono catchment supports mahinga kai, and the indigenous biodiversity and cultural values of Wainono Lagoon are enhanced.</u> <u>Water quality in the Northern Catchment Area is maintained and flows and habitat values in these streams are improved.</u> <u>Water quality and flows in the Morven Drain and Sinclair's Creek catchments are maintained.</u> <u>Further irrigation and land use development is enabled in catchments using alternative water sources.</u> <u>The freshwater outcomes set out in table 15(a) and (b) are met.</u>
Freshwater Outcomes 15.3	V3pLWRP-291	52267	Horticulture New Zealand	Oppose	Delete 'Objectives' in Section 15.3 Freshwater Outcomes
Freshwater Outcomes 15.3	V3pLWRP-702	56725	Fertiliser Association of New Zealand	Oppose	<p>Amend Section 15.3 as follows:</p> <p>"See Objectives in Section 3 and freshwater outcomes represented in Tables 15(a) and 15(b)"</p>
Policies 15.4	V3pLWRP-123	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Add the following new policy to the start of Section 15.4:</p> <p><u>Recognise the cultural significance of the Waihao-Wainono catchment, the Northern Area Streams, and the Morven-Sinclairs Area to Ngāi Tahu; and enable Ngāi Tahu to exercise kaitiakitanga and enhance mahinga kai through:</u></p> <p><u>i) Minimising the discharge of any contaminants into water;</u></p> <p><u>ii) Protecting natural wetlands and springheads;</u></p> <p><u>iii) Maintaining flow and water quality in the Waihao River;</u></p> <p><u>iv) Improving flows in lowland streams over time;</u></p> <p><u>v) Restoring the quality of water in lowland streams to enable mahinga kai; and</u></p> <p><u>vi) Improving the water quality and biodiversity of Wainono Lagoon</u></p>
Policies 15.4	V3pLWRP-125	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Add the following new policy to the start of Section 15.4:</p> <p><u>Recognize the Wainono Lagoon, the Dead Arm, the Waihao River, Fenton Reserves and mātaītai as Cultural Landscapes as shown on the planning maps.</u></p> <p><u>Ensure Ngāi Tahu's interests and values in the Cultural Landscape Areas are reflected in:</u></p> <p><u>- Environmental restoration or enhancement projects that affect areas in the Cultural Landscapes including any augmentation of Wainono Lagoon and the Wainono Restoration Programme;</u></p> <p><u>- Farm Environment Plans involving land in or adjoining the Cultural Landscapes areas; and</u></p> <p><u>- Resource consents to dam, divert, take or use water, to use land, or to discharge contaminants which may affect areas in the Cultural Landscape Areas.</u></p>

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Policies 15.4	V3pLWRP-138	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Insert a new policy as follows:</p> <p><u>Recognise the interconnectivity of surface water and shallow groundwater in the South Canterbury Coastal Area and:</u></p> <p><u>(i) Manage the allocation of surface water and groundwater as one resource where it is hydraulically connected; and</u></p> <p><u>(ii) Require minimum flow conditions that comply with Table 15(g) to (j) on any surface water take or any groundwater take where the abstraction point is located within any Flow Protection Zone and the top of the screen is less than 30m below ground level.</u></p> <p><u>(iii) Ensure activities involving the damming, diverting, taking or using of water do not exceed the allocation limits set out in Tables 15(f) to (l); and where those limits are already exceeded phase out over allocation.</u></p>
Policies 15.4	V3pLWRP-139	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Insert a new policy as follows:</p> <p><u>Undertake a comprehensive review of the surface and groundwater allocation for South Canterbury Coastal Area and set surface and groundwater allocation limits and a plan to phase out over-allocation by 01 July 2018.</u></p>
Policies 15.4	V3pLWRP-189	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Insert a new Policy for the amendment of load targets/limits and relevant thresholds, including flexibility caps and maximum caps, as new versions of OVERSEER® are released, to ensure that those loads, caps and thresholds continue to serve their intended purpose.</p> <p>[Submitter notes relevance to Policies 15.4.5, 15.4.6, 15.4.7 and 15.4.8 which refer to maximum caps and flexibility caps]</p>
Policies 15.4	V3pLWRP-275	52267	Horticulture New Zealand	Oppose	<p>Insert a new policy as follows:</p> <p><u>In times of water storages provide for taking of water for the sole purpose of avoiding the death of horticultural root stock or crops as provided for in consent conditions .</u></p>
Policies 15.4	V3pLWRP-304	52267	Horticulture New Zealand	Oppose	<p>Insert a new policy to enable transfer of nitrogen within and between enterprises and farms within the same water management unit, or similar rules and methods to give effect to development of a transfer system.</p> <p>[See Submission Point ID V3pLWRP-355 for related amendments to the Rules].</p>
Policies 15.4	V3pLWRP-405	53683	Dairy Holdings Limited	Oppose	<p>Insert a new Policy 15.4.13A after Policy 15.4.13 as follows:</p> <p><u>15.4.13A Enable disestablishment of Farming Enterprises, by which each parcel of land formerly used in the enterprise does not exceed either:</u></p> <p><u>(a) the individual flexibility cap and nitrogen baseline (which is ever is greater) of land in that parcel; or</u></p> <p><u>(b) a nitrogen loss limit to be determined so that the aggregate of the flexibility caps and nitrogen baselines (which is ever is greater) of all the parcels formerly used in the enterprise is not exceeded.</u></p>
Policies 15.4	V3pLWRP-423	64072	David Linton	Oppose	<p>Insert a new policy to provide for greater flexibility and transition times and to recognise the potential for dryland development.</p>
Policies 15.4	V3pLWRP-508	64075	Otaio Water User Group	Oppose	<p>Amend nutrient policies by:</p> <ul style="list-style-type: none"> Specifying the OVERSEER® version used to determine the Nitrogen caps in the variation Accommodating the changing OVERSEER® versions through a schedule or by some other effective means by a group established for this role and in agreement with ECan Given the concerns with OVERSEER®, potentially use MGM with Flexibility caps instead. <p>Seeks this is resolved and agreed to prior to a hearing.</p>
Policies 15.4	V3pLWRP-639	55552	Hunter Downs Development Company Limited	Oppose	<p>Insert a new Policy 15.4.14A (prior to policy 15.4.14) as follows:</p> <p><u>15.4.14A Enable the development of new irrigation in the Waihao-Wainono Area and Northern Streams Area for the purposes of giving effect to:</u></p> <p><u>(a) the consented HDI and WDIS schemes, which are intended to take water from the Waitaki River for the irrigation of a further 27,000</u></p>

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					<p><u>hectares; and</u></p> <p><u>(b) the augmentation of Wainono Lagoon</u></p> <p>Alternatively, incorporate the overall vision of the Zone Committee (as currently included at the bottom of page 15-2), in an objective.</p>
Policies 15.4	V3pLWRP-683	61382	NZ Pork Industry Board	Oppose	Delete definition and all references to "Maximum cap" because this cannot be defined as the only available tools have a margin of error of up to 30%.
Policies 15.4	V3pLWRP-694	63247	Ballance Agri-Nutrients Limited	Oppose	<p>Insert non-regulatory provisions (or similar) that establish the process for establishing an independent technical advisory panel for the purpose of:</p> <p>i. Developing a phased implementation plan and timeline;</p> <p>ii. Ensuring the appropriate use of OVERSEER® within the South Coastal Canterbury Area and any associated requirements (which could include the development and implementation of a common data gathering, entering and modelling protocol).</p>
Policies 15.4	V3pLWRP-703	56725	Fertiliser Association of New Zealand	Oppose	<p>Amend Section 15A, 15.4 as follows:</p> <p>"The following policies apply in the South Coastal Canterbury Area, in addition to those set out in Section 4 of the Plan. <u>Where a conflict in policy occurs, the policies in Section 15.4 prevail over policies in Section 4 of the Plan</u>"</p>
Policies 15.4	V3pLWRP-730	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential for dryland development and or low emitter property development .
Policies 15.4	V3pLWRP-733	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	<p>Amend Policies 15.4.1 - 15.4.17 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to low emitting properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load for stable low emitting farming systems ,extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline timeframes for achievement of max caps need to be 2025 as per the NARG agreement
Policies 15.4	V3pLWRP-745	64067	Keith and Christine Adams	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-748	64067	Keith and Christine Adams	Oppose	<p>Amend Policies 15.4.1 - 15.4.17 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to low emitting properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline timeframes for achievement of max caps need to be 2025 as per the NARG agreement
Policies 15.4	V3pLWRP-758	64135	Goldwyn Angus Limited	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-762	64135	Goldwyn Angus Limited	Oppose	<p>Amend Policies 15.4.1 - 15.4.17 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to low emitting properties over time

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					<ul style="list-style-type: none"> immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load for stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline timeframes for achievement of max caps need to be 2025 as per the NARG agreement
Policies 15.4	V3pLWRP-784	64125	Beef and Lamb New Zealand Ltd	Oppose	<p>Amend Policies 15.4.1 to 15.4.17 to:</p> <ul style="list-style-type: none"> provide for development of existing dryland and properties with small areas of irrigation provide for flexibility in current farming system if benchmark is above flexibility cap increase number of years in calculation of [nitrogen] baseline provide for more allocation to dryland/low N emission properties over time immediately adopt flexibility cap to up to 15kg N/Ha for stable dryland farming systems where emissions exceed 15kgN/Ha extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline provide for incorporating updated OVERSEER® versions, soils data and the Matrix of Good Management.
Policies 15.4	V3pLWRP-787	64121	David Sleigh	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-789	64121	David Sleigh	Oppose	<p>Amend Policies 15.4.1 - 15.4.17 to provide for:</p> <ul style="list-style-type: none"> low level development of existing dryland properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to dryland properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg for stable dryland farming systems extend, the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Policies 15.4	V3pLWRP-801	64120	Guy Wigley	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-804	64120	Guy Wigley	Oppose	<p>Amend Policies 15.4.1 - 15.4.17 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to low emitting properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load for stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline timeframes for achievement of max caps need to be 2025 as per the NARG agreement
Policies 15.4	V3pLWRP-816	64042	John Gardner	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-820	64042	John Gardner	Oppose	<p>Amend Policies 15.4.1 - 15.4.17 to provide for:</p> <ul style="list-style-type: none"> low level development of existing dryland properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to dryland properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg for stable dryland farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum

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					discharge from those years as the baseline
Policies 15.4	V3pLWRP-835	64080	Daniel Studholme	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-837	64080	Daniel Studholme	Oppose	Amend Policies 15.4.1 - 15.4.17 to provide for: <ul style="list-style-type: none"> low level development of existing dryland and properties with a small area of irrigation as part of predominately dryland properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to dryland properties over time immediately adopting the flexibility cap to dryland farmers up to 15kg For stable dryland farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Policies 15.4	V3pLWRP-845	64099	David Gardner	Oppose	Insert a new policy to provide for greater flexibility and transition times and to recognise the potential of low emitter property development.
Policies 15.4	V3pLWRP-847	64099	David Gardner	Oppose	Amend Policies 15.4.1 - 15.4.17 to provide for: <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of baseline more allocation to dryland properties over time immediately adopting the flexibility cap to dryland farmers up to 15kg For stable dryland farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Policies 15.4	V3pLWRP-972	64076	Community and Public Health	Oppose	Insert policies for the Southern Coastal Streams sub-regional chapter which aim to improve water quality in this area.
Policies 15.4	V3pLWRP-1009	64090	Fonterra Co-operative Group Limited	Oppose	Insert new Policy 15.4.13A as follows: <p><u>Require any person discharging wastewater, liquid waste or waste sludge from an industrial or trade process into or onto land to adopt the best practical option to manage the treatment and discharge of contaminants and not exceed the nitrogen load limit for industrial and trade processes in Table 15(o) unless Policy 15.4.13B applies.</u></p> <p>Insert Policy 15.5.13B [submitter seeks for Policy 15.4.13B] as follows:</p> <p><u>Enable the discharge of wastewater, liquid waste or water sludge from an industrial or trade process into or onto land which cumulatively will result in the exceedance of the nitrogen load limit for industrial and trade processes in Table 15(o) only in circumstances where the loss of nitrogen from the land, being from both the discharges and any farming activity occurring on the land, does not exceed any authorised discharge of nitrogen from the land that was occurring prior to the discharge of wastewater.</u></p>
15.4.1	V3pLWRP-126	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Policy 15.4.1 as follows: <p>Improve water quality in the South Coastal Canterbury Area by reducing losses of microbes, phosphorus and sediment through excluding intensively farmed stock from drains (in addition to the region-wide stock exclusion provisions) and enabling the Wainono Restoration Project.</p>
15.4.1	V3pLWRP-127	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete Policies 15.4.1 and 15.4.4 and replace with a new policy as follows: <p><u>Maintain or improve water quality and minimise the discharge of contaminants into water in the South Canterbury Coastal Area by:</u></p> <p><u>(i) Excluding intensively farmed livestock from having access to lakes, rivers and drains (except for stock crossing points);</u></p>

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					<p><u>(ii) Requiring all farming activities to adopt the good management practices set out in Schedule 24b; and</u></p> <p><u>(iii) requiring any farming activity which requires a resource consent to develop and implement a Farm Environment Plan prepared in accordance with Schedule 7.</u></p> <p>[See submission point ID V3pLWRP-128]</p>
15.4.1	V3pLWRP-182	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.1 but include a new definition of Surface Drain [see submission point V3pLWRP-180].
15.4.1	V3pLWRP-239	63179	DairyNZ	Oppose	Delete Policy 15.4.1 [as a consequence of submission points V3pLWRP-235 and V3pLWRP-254]
15.4.1	V3pLWRP-367	53274	Central South Island Fish and Game	Oppose	<p>Replace Policy 15.4.1 with the following:</p> <p><u>Improve water quality in the South Coastal Canterbury Area by reducing losses of microbial contaminants, nitrogen, phosphorus and sediment by excluding cattle, pigs and deer from surface waterbodies, drains and ephemeral waterways and enabling the Wainono Restoration Project through constructing, planting and maintaining suitable riparian areas to buffer waterways, including artificial waterways, from the effects of stock and surrounding land use.</u></p>
15.4.1	V3pLWRP-475	64095	Department of Conservation	Oppose	Amend Policy 15.4.1 by replacing the term "microbes" with " <u>microbial contaminants</u> ".
15.4.1	V3pLWRP-490	64075	Otaio Water User Group	Support	Retain Policy 15.4.1 as notified.
15.4.1	V3pLWRP-610	64077	New Zealand Deer Farmers' Association South Canterbury North Otago Branch	Oppose	<p>Clarify what “intensively farmed stock” means in Policy 15.4.1 as per Decision Version of the Proposed Land and Water Regional Plan, namely:</p> <ol style="list-style-type: none"> 1. Cattle or deer grazed on irrigated land or contained for break feeding of winter feed crops; 2. dairy cattle, including cows, whether dry or milking, and calves, whether on irrigated land or not; or 3. farmed pigs
15.4.1	V3pLWRP-631	64090	Fonterra Co-operative Group Limited	Oppose	Delete Policy 15.4.1 [as a consequence of submission points V3pLWRP-235 and V3pLWRP-254]
15.4.1	V3pLWRP-632	55552	Hunter Downs Development Company Limited	Support	Retain Policy 15.4.1 as notified.
15.4.1	V3pLWRP-867	64013	Graham Patterson	Oppose	<p>Seeks that fencing is not required for all waterways, and specifically not for high country, extensive farms and extensive deer farming operations.</p> <p>[Original submission lodged against Variation 3 as a whole but seeks an amendment to Policy 15.4.1 and Rule 15.5.19]</p>
15.4.1	V3pLWRP-882	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission which requests to retain Policy 15.4.1 with a new definition for "Surface drain" [see submission point V3pLWRP-182].
15.4.1	V3pLWRP-973	64076	Community and Public Health	Support	Retain Policy 15.4.1 as notified.
15.4.2	V3pLWRP-27	64043	Roger and Lisa Small	Oppose	Seeks the nitrogen load be recalculated using soil maps and a bottom up approach using water flows and what the receiving environments can handle to meet water quality limits.
15.4.2	V3pLWRP-183	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Amend Policy 15.4.2 as follows:</p> <p><u>Contribute to A-achieving the water quality outcomes for the Northern Streams Area, Waihao-Wainono Area and the Morven-Sinclairs Area by not exceeding the nitrogen load limits in Tables 15(o) and 15(p). The load limits in Tables 15(o) and 15(p) will be reviewed when the MGM project is complete and when new versions of OVERSEER® are issued.</u></p>

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15.4.2	V3pLWRP-235	63179	DairyNZ	Oppose	Amend Policy 15.4.2 by combining with Policy 15.4.1 as follows: <u>Achieve the water quality outcomes for the South Coastal Canterbury Area by:</u> <u>a) Reducing losses of microbes, phosphorus and sediment;</u> <u>b) Enabling the Wainono Restoration Project; and</u> <u>c) Limiting the aggregate nitrogen discharge from farming activities to the load limits specified in Tables 15(o) and 15(p).</u>
15.4.2	V3pLWRP-292	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.2 as follows: Achieve the Improve water quality outcomes for the Northern Streams Area, Waihao-Wainono Area and the Morven-Sinclairs Area by not exceeding the nitrogen load limits in Tables 15(o) and 15(p).
15.4.2	V3pLWRP-443	64095	Department of Conservation	Support	Retain Policy 15.4.2 as notified
15.4.2	V3pLWRP-630	64090	Fonterra Co-operative Group Limited	Oppose	Amend Policy 15.4.2 by combining with Policy 15.4.1 as follows: <u>Achieve the water quality outcomes for the South Coastal Canterbury Area by:</u> <u>a) Reducing losses of microbes, phosphorus and sediment;</u> <u>b) Enabling the Wainono Restoration Project; and</u> <u>c) Limiting the aggregate nitrogen discharge from farming activities to the load limits specified in Tables 15(o) and 15(p).</u>
15.4.2	V3pLWRP-636	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.2 as follows: 15.4.2 Achieve the water quality outcomes for the Northern Streams Area, Waihao-Wainono Area and the Morven-Sinclairs Area by not exceeding the nitrogen load limits in Tables 15(o) and 15(p) <u>taking into account</u> : <u>a) an estimate landuse mix of 70% Dairy, 10% Sheep, Beef and Deer, 10% dairy support and 10% intensive seasonal cropping; and</u> <u>b) an instream nitrate toxicity level of 90%</u>
15.4.2	V3pLWRP-690	63247	Ballance Agri-Nutrients Limited	Oppose	Amend Policy 15.4.2 as follows (or similar): "Achieve the water quality outcomes for the Northern Stream Area, Waihao-Wainono Area and the Morven-Sinclairs Area by not exceeding the : <u>i. Requiring discharges from agricultural and horticultural activity to not exceed the nitrogen load limits set out in Table 15(p); and</u> <u>ii. Requiring discharges from industrial and urban land uses listed in Table (o), to not exceed the load limits set out in Table (o)"</u>
15.4.2	V3pLWRP-774	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Policy 15.4.2 to read (or similar): "Achieve the water quality outcomes for the Northern Streams Area, Waihao-Wainono Area and the Morven-Sinclairs Area by not exceeding <u>ensuring</u> the nitrogen load limits in Tables 15(o) and 15(p) 15p <u>are not exceeded in accordance with the timeframes listed.</u> "
15.4.2	V3pLWRP-883	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission which requests an amendment to Policy 15.4.2 [see submission point V3pLWRP-183].
15.4.3	V3pLWRP-184	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Replace Policy 15.4.3 with the following: <u>Meet the nitrogen load limits for the Northern Streams, Waihao-Wainono and Morven-Sinclairs Plains and Hill Areas by ensuring that nitrogen management occurs within each of those areas to meet the catchment loads that apply to each respective area.</u>

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15.4.3	V3pLWRP-240	63179	DairyNZ	Oppose	Amend Policy 15.4.3 to clarify the intent of “movement of nitrogen” [between Plains Areas and Hill Areas] and use alternative terminology in the policy.
15.4.3	V3pLWRP-293	52267	Horticulture New Zealand	Oppose	Delete Policy 15.4.3.
15.4.3	V3pLWRP-444	64095	Department of Conservation	Support	Retain Policy 15.4.3 as notified
15.4.3	V3pLWRP-503	64075	Otaio Water User Group	Oppose	Clarify the intent of Policy 15.4.3.
15.4.3	V3pLWRP-775	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Delete Policy 15.4.3.
15.4.3	V3pLWRP-884	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.3 as outlined in the South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-184].
15.4.3	V3pLWRP-964	64090	Fonterra Co-operative Group Limited	Oppose	Amend Policy 15.4.3 to clarify the intent when it refers to “movement of nitrogen” [between Plains Areas and Hill Areas] and use alternative terminology in the policy to explain that intent.
15.4.4	V3pLWRP-5	64011	Oceania Dairy Limited	Oppose	Amend Policy 15.4.4(a) to remove any requirement or expectation for farming activities to operate at better than good management practice (GMP).
15.4.4	V3pLWRP-28	64043	Roger and Lisa Small	Oppose	Seeks the inclusion of 'MGM project' in this variation.
15.4.4	V3pLWRP-128	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Policies 15.4.1 and 15.4.4 and replace with a new policy as follows:</p> <p><u>Maintain or improve water quality and minimize the discharge of contaminants into water in the South Canterbury Coastal Area by:</u></p> <p><u>(i) Excluding intensively farmed livestock from having access to lakes, rivers and drains (except for stock crossing points);</u></p> <p><u>(ii) Requiring all farming activities to adopt the good management practices set out in Schedule 24b; and</u></p> <p><u>(iii) requiring any farming activity which requires a resource consent to develop and implement a Farm Environment Plan prepared in accordance with Schedule 7.</u></p> <p>[See also submission point ID V3pLWRP-127]</p>
15.4.4	V3pLWRP-185	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Amend Policy 15.4.4(a) as follows:</p> <p>(a) All farming activities to operate at good management practice or better , <u>as defined by the benchmarks and practices defined by the Matrix of Good Management Project. These benchmarks and practices will change, as appropriate, with the development of good management practice over time.</u></p>
15.4.4	V3pLWRP-254	63179	DairyNZ	Oppose	<p>Amend Policy 15.4.4 to read:</p> <p><u>Reduce the impact of farming activities on water quality of the South Canterbury Area by requiring:</u></p> <p><u>a) all farming activities to adopt the Good Management Practices set out in Schedule 24b unless alternative practices are more appropriate; and</u></p> <p><u>b) the preparation and implementation of a Farm Environment Plan for the use of any land by any farming activity requiring a resource consent; and</u></p> <p><u>c) the exclusion of intensively farmed stock from drains (in additional to the region wide stock exclusion provisions).</u></p> <p>[As a consequence, delete Policy 15.4.1 - see Submission Point ID V3pLWRP-239 for consequential amendment]</p>
15.4.4	V3pLWRP-294	52267	Horticulture New Zealand	Support	Retain Policy 15.4.4 as notified.

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15.4.4	V3pLWRP-368	53274	Central South Island Fish and Game	Oppose	Amend Policy 15.4.4 as follows: Improve water quality in the South Coastal Canterbury Area by requiring: (a) all farming activities to <u>comply with the nutrient discharge allowance</u> operate at good management practice or better ; and (b) all farming activities to prepare and implement farm environment management plans the preparation and implementation of a Farm Environment Plan in accordance with Schedule 24B, which sets out and defines good environmental management practice to reduce current nitrogen, phosphorus and microbial contaminant losses for the use of land for any farming activity subject to a resource consent .
15.4.4	V3pLWRP-445	64095	Department of Conservation	Support	Retain Policy 15.4.4 as notified
15.4.4	V3pLWRP-505	64075	Otaio Water User Group	Oppose	Amend Policy 15.4.4(b) by including all farms.
15.4.4	V3pLWRP-611	64077	New Zealand Deer Farmers' Association South Canterbury North Otago Branch	Oppose	Opposes in Policy 15.4.4(a), requirements that place extra costs on low nitrogen emitters and prefers all farming activities operating above maximum caps be required to operate at Good Management Practice (GMP) or better. Seeks [that policies] clarify how all farming activities are to operate at GMP or better, and that where deer farms are required to provide FEPs, that they are not penalized or disadvantaged if they are unable to immediately access appropriate (including being knowledgeable about deer systems) and qualified service providers.
15.4.4	V3pLWRP-637	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.4 by removing the words "or better".
15.4.4	V3pLWRP-776	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Policy 15.4.4 clause (a) to read: “(a) all farming activities to operate at meet nitrogen loss rates under good management practice or better ; and”
15.4.4	V3pLWRP-868	64013	Graham Patterson	Oppose	Amend Policy 15.4.4 to include the following: <ul style="list-style-type: none"> • clear explanation and standardised guidelines of GMP • clear structure for the verification/auditing process structure for GMP • sensible time frames for compiling evidence to support a farm's GMP/Farm plan • not requiring drystock farmers to produce an OVERSEER® nutrient budget every year. [Submission highlights concerns about operating at GMP and FEPs in relation to Policy 15.4.5 which is assumed to be a typographical error as Policy 15.4.4 addresses these topics]
15.4.4	V3pLWRP-885	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.4 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-185].
15.4.4	V3pLWRP-967	64090	Fonterra Co-operative Group Limited	Oppose	Amend Policy 15.4.4 as to read: <u>Reduce the impact of farming activities on water quality of the South Canterbury Area by requiring:</u> <u>a) all farming activities to adopt the Good Management Practices set out in Schedule 24b unless alternative practices are more appropriate; and</u> <u>b) the preparation and implementation of a Farm Environment Plan for the use of any land by any farming activity requiring a resource consent; and</u> <u>c) the exclusion of intensively farmed stock from drains (in addition to the region wide stock exclusion provisions).</u> [As a consequence, delete Policy 15.4.1 - see Submission Point ID V3pLWRP-631 for consequential amendment]
15.4.4	V3pLWRP-974	64076	Community and Public Health	Support	Retain Policy 15.4.4 as notified.

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15.4.5	V3pLWRP-31	64043	Roger and Lisa Small	Oppose	Amend Policy 15.4.5 to adopt time frames as per ZIP Addendum and re-negotiation of max caps and flexibility caps.
15.4.5	V3pLWRP-129	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Policies 15.4.5, 15.4.6 and 15.4.7 and replace with a new policy as follows:</p> <p><u>15.4.5</u></p> <p><u>Improve water quality in the Northern Stream Area and Waihao-Wainono Area while providing flexibility in land-use by:</u></p> <p><u>(i) Permitting farming activities whose estimated nitrogen losses do not exceed the flexibility cap limits set out in Table 15(m).</u></p> <p><u>(ii) Allowing farming activities whose estimated nitrogen losses exceed the flexibility cap in Table 15(m) provided there is no increase in the nitrogen baseline for the farming activity, and the nitrogen baseline does not exceed the maximum nitrogen loss cap set out in Table 15(n).</u></p> <p><u>(iii) Requiring farming activities with estimated nitrogen losses that exceed the maximum nitrogen loss caps in Table 15(n) to start reducing their nitrogen losses and to comply with the maximum flexibility cap in Table 15(n) by no later than 01 January 2030.</u></p> <p><u>(iv) Allowing changes in land uses provided the estimated nitrogen losses from the change in land use do not exceed the maximum nitrogen cap in Table 15(n); and do not exceed the greater of the nitrogen baseline for the property prior to the change in land use or the flexibility cap set out in Table 15(m).</u></p> <p><u>Policy 15.4.6</u></p> <p><u>Notwithstanding Policy 15.4.5, on soils shown on the Planning Maps as extremely light, allow farming activities with estimated nitrogen losses which exceed the maximum nitrogen loss cap in Table 15(n) to continue past 01 January 2030 provided that:</u></p> <p><u>(i) The farming activity is subject to a Farm Environmental Plan which shows how the maximum nitrogen loss cap will be met and by what timeframe; and</u></p> <p><u>(ii) There is no change to landuse, unless that change of land use is part of facilitating nitrogen loss reductions under the Farm Environment Plan.</u></p> <p>[See submission point ID V3pLWRP-130 and 131]</p>
15.4.5	V3pLWRP-186	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Policy 15.4.5(a) to be consistent with the Nitrogen Allocation Reference Group framework, in particular to require existing farming activities to comply with the maximum cap by 2025.
15.4.5	V3pLWRP-261	63179	DairyNZ	Oppose	<p>Amend Policy 15.4.5 to read:</p> <p><u>Manage nitrogen losses from farming activities</u> Improve water quality in the Northern Streams Area and Waihao-Wainono Area by requiring :</p> <p><u>(a) From 15 May 2015 enabling farming activities to operate in accordance with the greater of the nitrogen baseline or the flexibility cap relevant to the respective area except where provided for in accordance with Policy 15.4.6; and</u></p> <p><u>(a b) From 1 January 2030 reduce discharges of nitrogen in the catchment by requiring all existing farming activities that have a nitrogen baseline greater than the flexibility cap to except those on extremely light soils as shown on the Planning Maps , to comply with the maximum cap annual nitrogen loss rate set out in Table 15 (n) except where provided for in accordance with Policy 15.4.7;</u></p>
15.4.5	V3pLWRP-295	52267	Horticulture New Zealand	Oppose	<p>Amend Policy 15.4.5(a) as follows:</p> <p>all existing farming activities, <u>farming enterprise and nutrient user groups</u>, except those on extremely light soils as shown on the Planning Maps, to comply with the minimum cap by 1 January 2030; and</p>
15.4.5	V3pLWRP-446	64095	Department of Conservation	Support	Retain Policy 15.4.5 as notified
15.4.5	V3pLWRP-633	55552	Hunter Downs Development	Support	Retain Policy 15.4.5 as notified.

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			Company Limited		
15.4.5	V3pLWRP-777	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Amend Policy 15.4.5 as follows:</p> <p>“Improve water quality in the Northern Streams Area and Waihao-Wainono Area by requiring:</p> <p>(a) all existing farming activities, except those on extremely light soils as shown on the Planning Maps, to comply with <u>meet the maximum cap good management practice value</u> by 1 January 2030; and</p> <p>(b) all new farming activities to comply with <u>meet the maximum cap good management practice values</u> from 1 May 2017.”</p> <p>[Also see submission points V3pLWRP-768, V3pLWRP-769 and V3pLWRP-770 on definitions of ‘farming activity’, ‘existing farming activity’ and ‘new farming activity’]</p>
15.4.5	V3pLWRP-886	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.5 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-186]
15.4.5	V3pLWRP-968	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Policy 15.4.5 to read:</p> <p><u>Manage nitrogen losses from farming activities</u> Improve water quality in the Northern Streams Area and Waihao-Wainono Area by requiring:</p> <p><u>(a) From 15 May 2015 enabling farming activities to operate in accordance with the greater of the nitrogen baseline or the flexibility cap relevant to the respective area except where provided for in accordance with Policy 15.4.6; and</u></p> <p><u>(a b) From 1 January 2030 reduce discharges of nitrogen in the catchment by requiring all existing farming activities that have a nitrogen baseline greater than the flexibility cap to except those on extremely light soils as shown on the Planning Maps , to comply with the maximum cap annual nitrogen loss rate set out in Table 15 (n) except where provided for in accordance with Policy 15.4.7;</u></p>
15.4.6	V3pLWRP-130	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Policies 15.4.5, 15.4.6 and 15.4.7 and replace with a new policy as follows:</p> <p><u>Policy 15.4.5</u></p> <p><u>Improve water quality in the Northern Stream Area and Waihao-Wainono Area while providing flexibility in land-use by:</u></p> <p><u>(i) Permitting farming activities whose estimated nitrogen losses do not exceed the flexibility cap limits set out in Table 15(m).</u></p> <p><u>(ii) Allowing farming activities whose estimated nitrogen losses exceed the flexibility cap in Table 15(m) provided there is no increase in the nitrogen baseline for the farming activity, and the nitrogen baseline does not exceed the maximum nitrogen loss cap set out in Table 15(n).</u></p> <p><u>(iii) Requiring farming activities with estimated nitrogen losses that exceed the maximum nitrogen loss caps in Table 15(n) to start reducing their nitrogen losses and to comply with the maximum flexibility cap in Table 15(n) by no later than 01 January 2030.</u></p> <p><u>(iv) Allowing changes in land uses provided the estimated nitrogen losses from the change in land use do not exceed the maximum nitrogen cap in Table 15(n); and do not exceed the greater of the nitrogen baseline for the property prior to the change in land use or the flexibility cap set out in Table 15(m).</u></p> <p><u>Policy 15.4.6</u></p> <p><u>Notwithstanding Policy 15.4.5, on soils shown on the Planning Maps as extremely light, allow farming activities with estimated nitrogen losses which exceed the maximum nitrogen loss cap in Table 15(n) to continue past 01 January 2030 provided that:</u></p> <p><u>(i) The farming activity is subject to a Farm Environmental Plan which shows how the maximum nitrogen loss cap will be met and by what timeframe; and</u></p> <p><u>(ii) There is no change to landuse, unless that change of land use is part of facilitating nitrogen loss reductions under the Farm Environment Plan.</u></p>

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					[See submission point ID V3pLWRP-129 and 131]
15.4.6	V3pLWRP-188	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.5 [15.4.6], as notified. [Submitter put relief against Policy 15.4.5 which is assumed to be a typographical error as submitter refers to Policy 15.4.6 in their submission]
15.4.6	V3pLWRP-265	63179	DairyNZ	Oppose	Amend Policy 15.4.6 to read: In the Northern Streams Area and Waihao-Wainono Area, improve water quality while allowing for the continued operation of existing farming activities above the greater of their nitrogen baseline or flexibility cap where those activities are located within the Orange or Green nutrient allocation zone and lawfully increased their nitrogen loss above their nitrogen baseline and flexibility cap before 15 May 2015 provided: <u>a) The increase in nitrogen loss beyond the nitrogen baseline does not exceed 5kg nitrogen per hectare per annum; and</u> <u>b) the farming activity is operated in accordance with a Farm Environment Plan that sets out actions to be implemented to ensure long-term compliance with the maximum annual nitrogen loss rate in Table 15(n).</u>
15.4.6	V3pLWRP-448	64095	Department of Conservation	Support	Retain Policy 15.4.6 as notified
15.4.6	V3pLWRP-634	55552	Hunter Downs Development Company Limited	Support	Retain Policy 15.4.6 as notified.
15.4.6	V3pLWRP-783	56708	Ravensdown Fertiliser Co- operative Limited	Oppose	Amend Policy 15.4.6 as follows (or similar): “ <u>Improve water quality</u> in in the Northern Streams Area and Waihao-Wainono Area , improve water quality while : (a) allowing for the continued operation of existing farming activities on extremely light soils ; provided (b) the farming activity is operated in accordance with a Farm Environment Plan that sets out actions to be implemented to ensure long-term compliance with the maximum cap in Table 15(n) <u>good management practice values to be determined by MGM.</u> ” [Also see submission points V3pLWRP-768, V3pLWRP-769 and V3pLWRP-770 on definitions of ‘farming activity’, ‘existing farming activity’ and ‘new farming activity’]
15.4.6	V3pLWRP-887	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission [see submission point V3pLWRP 188].
15.4.6	V3pLWRP-984	64090	Fonterra Co-operative Group Limited	Oppose	Amend Policy 15.4.6 to read: In the Northern Streams Area and Waihao-Wainono Area, improve water quality while allowing for the continued operation of existing farming activities above the greater of their nitrogen baseline or flexibility cap where those activities are located within the Orange or Green nutrient allocation zone and lawfully increased their nitrogen loss above their nitrogen baseline and flexibility cap before 15 May 2015 provided: <u>a) The increase in nitrogen loss beyond the nitrogen baseline does not exceed 5kg nitrogen per hectare per annum; and</u> <u>b) the farming activity is operated in accordance with a Farm Environment Plan that sets out actions to be implemented to ensure long-term compliance with the maximum annual nitrogen loss rate in Table 15(n).</u>
15.4.7	V3pLWRP-131	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete Policies 15.4.5, 15.4.6 and 15.4.7 and replace with a new policy as follows: <u>15.4.5</u> <u>Improve water quality in the Northern Stream Area and Waihao-Wainono Area while providing flexibility in land-use by:</u> <u>(i) Permitting farming activities whose estimated nitrogen losses do not exceed the flexibility cap limits set out in Table 15(m).</u> <u>(ii) Allowing farming activities whose estimated nitrogen losses exceed the flexibility cap in Table 15(m) provided there is no increase in the</u>

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					<p><u>nitrogen baseline for the farming activity, and the nitrogen baseline does not exceed the maximum nitrogen loss cap set out in Table 15(n).</u></p> <p><u>(iii) Requiring farming activities with estimated nitrogen losses that exceed the maximum nitrogen loss caps in Table 15(n) to start reducing their nitrogen losses and to comply with the maximum flexibility cap in Table 15(n) by no later than 01 January 2030.</u></p> <p><u>(iv) Allowing changes in land uses provided the estimated nitrogen losses from the change in land use do not exceed the maximum nitrogen cap in Table 15(n); and do not exceed the greater of the nitrogen baseline for the property prior to the change in land use or the flexibility cap set out in Table 15(m).</u></p> <p><u>Policy 15.4.6</u></p> <p><u>Notwithstanding Policy 15.4.5, on soils shown on the Planning Maps as extremely light, allow farming activities with estimated nitrogen losses which exceed the maximum nitrogen loss cap in Table 15(n) to continue past 01 January 2030 provided that:</u></p> <p><u>(i) The farming activity is subject to a Farm Environmental Plan which shows how the maximum nitrogen loss cap will be met and by what timeframe; and</u></p> <p><u>(ii) There is no change to landuse, unless that change of land use is part of facilitating nitrogen loss reductions under the Farm Environment Plan.</u></p> <p>[See submission point ID V3pLWRP-129 and 130]</p>
15.4.7	V3pLWRP-266	63179	DairyNZ	Oppose	<p>Delete Policy 15.4.7 and replace with the following policy:</p> <p><u>If the maximum annual nitrogen loss rates required in Policy 15.4.5(b) are unable to be achieved by 1 January 2030, any extension of time to achieve the reductions will be considered having regard to:</u></p> <p><u>a) The nitrogen baseline and the level of any enduring nitrogen loss rate reduction already achieved from that baseline; and</u></p> <p><u>b) The capital and operational costs of making nitrogen loss rate reduction and the benefit (in terms of maintaining a farming activity’s financial viability) of spreading that investment over time; and</u></p> <p><u>c) The nature, sequencing, measurability and enforceability of any steps proposed to achieve the nitrogen loss rate reductions.</u></p>
15.4.7	V3pLWRP-296	52267	Horticulture New Zealand	Support	Retain Policy 15.4.7 as notified.
15.4.7	V3pLWRP-428	53856	Blue Cliffs Station	Oppose	<p>Amend Policy 15.4.7 by inserting a new clause (c) as follows:</p> <p><u>requiring any proposal for a farming activity to increase the nitrogen loss calculation for the Northern Streams Hills or Northern Hills Plains above the nitrogen baseline or nitrogen flexibility cap relevant to the respective area to be considered through a resource consent process.</u></p>
15.4.7	V3pLWRP-449	64095	Department of Conservation	Support	Retain Policy 15.4.7 as notified
15.4.7	V3pLWRP-706	56725	Fertiliser Association of New Zealand	Support	Retain Policy 15.4.7 as notified.
15.4.7	V3pLWRP-785	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Amend Policy 15.4.7 as follows:</p> <p>“ Manage Control <u>nitrogen losses from land within Northern Streams Plains, Northern Streams Hill, Waihao-Wainono Plains and Waihao-Wainono Hill while providing for economic development</u> by:</p> <p>(a) <u>Requiring all</u> farming activities operating in accordance with maximum caps <u>good management practice values</u> and relevant flexibility cap; and</p> <p>(b) enabling <u>Requiring all</u> farming activities to operate in accordance with the greater of the nitrogen baseline or the flexibility cap relevant to</p>

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					the respective area.”
15.4.7	V3pLWRP-888	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission [see submission point V3pLWRP 189].
15.4.7	V3pLWRP-985	64090	Fonterra Co-operative Group Limited	Oppose	<p>Delete Policy 15.4.7 and replace with the following policy:</p> <p><u>If the maximum annual nitrogen loss rates required in Policy 15.4.5(b) are unable to be achieved by 1 January 2030, any extension of time to achieve the reductions will be considered having regard to:</u></p> <p><u>a) The nitrogen baseline and the level of any enduring nitrogen loss rate reduction already achieved from that baseline; and</u></p> <p><u>b) The capital and operational costs of making nitrogen loss rate reduction and the benefit (in terms of maintaining a farming activity’s financial viability) of spreading that investment over time; and</u></p> <p><u>c) The nature, sequencing, measurability and enforceability of any steps proposed to achieve the nitrogen loss rate reductions.</u></p>
15.4.8	V3pLWRP-29	64043	Roger and Lisa Small	Oppose	Amend Policy 15.4.8 to enable flexibility caps without augmentation as long as shallow groundwater, rivers and streams are of good quality.
15.4.8	V3pLWRP-132	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete Policy 15.4.8
15.4.8	V3pLWRP-297	52267	Horticulture New Zealand	Support	Retain Policy 15.4.8 as notified.
15.4.8	V3pLWRP-370	53274	Central South Island Fish and Game	Oppose	Delete Policy 15.4.8.
15.4.8	V3pLWRP-450	64095	Department of Conservation	Support	Retain Policy 15.4.8 as notified
15.4.8	V3pLWRP-638	55552	Hunter Downs Development Company Limited	Oppose	<p>Amend Policy 15.4.8 as follows:</p> <p>Improve water quality within Waihao-Wainono Area by enabling farming activities to access the higher flexibility caps in Table 15(m) when augmentation of Wainono Lagoon has occurred in the preceding calendar year.</p> <p><u>(a) enabling the development of irrigation in the Waihao-Wainono Area using consented Waitaki River water to facilitate the augmentation of Wainono Lagoon; and</u></p> <p><u>(b) enabling farming activities to access the higher flexibility caps in Table 15(m) when augmentation of Wainono Lagoon has occurred.</u></p>
15.4.8	V3pLWRP-707	56725	Fertiliser Association of New Zealand	Support	Retain Policy 15.4.8 as notified.
15.4.8	V3pLWRP-889	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission [see submission point V3pLWRP 189].
15.4.9	V3pLWRP-33	64043	Roger and Lisa Small	Oppose	<p>Amend Policy 15.4.9 as follows:</p> <p><u>a) Providing for farming activities to increase their nitrogen baseline calculation only if water quality outcomes are being met and they meet good management practice for farming type.</u></p>
15.4.9	V3pLWRP-133	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Replace Policy 15.4.9 with:</p> <p><u>Maintain water quality in the Morven-Sinclairs Area while providing for changes in land use by allowing farming activities to increase their nitrogen losses above the flexibility caps in Table 15(m) or their nitrogen baseline provided that:</u></p> <p><u>(i) The total load limit for the catchment set out in Table 15(p) is not exceed; and</u></p>

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					(ii) The proposed nitrogen loss is reasonable for the propose change in land use.
15.4.9	V3pLWRP-190	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Policy 15.4.9 as follows: Manage nitrogen losses within the Morven-Sinclairs Area while providing for economic development flexibility for intensification of farming activities by:
15.4.9	V3pLWRP-298	52267	Horticulture New Zealand	Support	Retain Policy 15.4.9 as notified.
15.4.9	V3pLWRP-371	53274	Central South Island Fish and Game	Oppose	Delete Policy 15.4.9
15.4.9	V3pLWRP-451	64095	Department of Conservation	Support	Retain Policy 15.4.9 as notified
15.4.9	V3pLWRP-708	56725	Fertiliser Association of New Zealand	Oppose	Amend Policy 15.4.9 to provide for increases in N loss calculation up to the flexibility cap as permitted activity. Retain Policy 15.4.9(a) subject to amendments to Table 15(p) [see submitters submission point V3pLWRP-958 for Table 15(p)].
15.4.9	V3pLWRP-793	56708	Ravensdown Fertiliser Co- operative Limited	Oppose	Amend Policy 15.4.9 as follows: “ Manage-Control nitrogen losses within the...”
15.4.9	V3pLWRP-890	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.9 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-190]
15.4.10	V3pLWRP-30	64043	Roger and Lisa Small	Support	Retain Policy 15.4.10 as notified.
15.4.10	V3pLWRP-191	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.10 as notified.
15.4.10	V3pLWRP-299	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.10 as follows: Flexibility in nitrogen management is enabled by allowing an increase in nitrogen loss beyond the respective nitrogen baseline, except for land in the Northern Streams Hill and Waihao-Wainono Hill Areas , provided the property is part of:
15.4.10	V3pLWRP-429	53856	Blue Cliffs Station	Oppose	Delete the words 'Northern Streams Hill' from Policy 15.4.10.
15.4.10	V3pLWRP-452	64095	Department of Conservation	Support	Retain Policy 15.4.10 as notified
15.4.10	V3pLWRP-520	64075	Otaio Water User Group	Oppose	Amend Policies 15.4.10 to 15.4.14 where if the Zones have different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone.
15.4.10	V3pLWRP-645	55552	Hunter Downs Development Company Limited	Support	Retain Policy 15.4.10 as notified.
15.4.10	V3pLWRP-709	56725	Fertiliser Association of New Zealand	Oppose	Amend Policy 15.4.10 to clarify its intent and to ensure it is consistent with Policy 15.4.7.
15.4.10	V3pLWRP-796	56708	Ravensdown Fertiliser Co- operative Limited	Support	Retain Policy 15.4.10 as notified. [See submission point ID V3pLWRP-864 for amendments sought by the submitter to the related Farming Enterprise rules]
15.4.10	V3pLWRP-891	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-191].
15.4.10	V3pLWRP-1012	53683	Dairy Holdings Limited	Oppose	Amend Policy 15.4.10 as follows:

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					<p>15.4.10 Flexibility in nitrogen management is enabled by allowing an increase in nitrogen loss beyond the respective nitrogen baseline, except for any land within the Northern Streams Hill and Waihao-Wainono Hill areas, provided the property is part of:</p> <p>(a) a Nutrient User Group; or</p> <p>(b) an irrigation scheme; or</p> <p>(c) a Farming Enterprise.</p>
15.4.11	V3pLWRP-34	64043	Roger and Lisa Small	Support	Retain Policy 15.4.11 as notified.
15.4.11	V3pLWRP-134	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Replace Policy 15.4.11 with:</p> <p><u>Maintain the catchment load limits for nitrogen by not allowing the transfer of nitrogen baselines or limits between properties unless:</u></p> <p><u>(i) they are part of a nutrient user group, irrigation scheme or farming enterprise; and</u></p> <p><u>(ii) the transfer is undertaken in accordance with a resource consent; and</u></p> <p><u>(iii) for Nutrient User Groups and Farm Enterprises all properties are located within the same surface water allocation zone.</u></p>
15.4.11	V3pLWRP-192	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.11 as notified.
15.4.11	V3pLWRP-300	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.11 by deleting "Surface Water Allocation Zone" and replacing with <u>nutrient discharge allocation area</u> .
15.4.11	V3pLWRP-453	64095	Department of Conservation	Support	Retain Policy 15.4.11 as notified
15.4.11	V3pLWRP-529	64075	Otaio Water User Group	Oppose	Amend Policies 15.4.10 to 15.4.14 where if the Zones have different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone.
15.4.11	V3pLWRP-710	56725	Fertiliser Association of New Zealand	Support	Retain Policy 15.4.11 as notified.
15.4.11	V3pLWRP-821	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Amend Policy 15.4.11 to read:</p> <p>“ Avoid <u>Ensure the catchment nutrient load limits being are not exceeded by only allowing...</u>”</p>
15.4.11	V3pLWRP-892	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-192].
15.4.11	V3pLWRP-1013	53683	Dairy Holdings Limited	Oppose	<p>Amend Policy 15.4.11 as follows:</p> <p>15.4.11 Avoid catchment nutrient load limits being exceeded by only allowing Farming Enterprises or Nutrient User Groups to establish and operate where all the properties are located in the same Surface Water Allocation Zone.</p>
15.4.12	V3pLWRP-35	64043	Roger and Lisa Small	Support	Retain Policy 15.4.12 as notified.
15.4.12	V3pLWRP-193	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Amend Policy 15.4.12 as follows:</p> <p>Maintain water quality by restricting the movement of nitrogen between properties <u>Manage nitrogen losses by attributing responsibility of nitrogen loss to individual properties unless:...</u></p>
15.4.12	V3pLWRP-301	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.12 as follows:

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					<p>Maintain water quality by limiting <u>restricting</u> the movement of nitrogen <u>allowances</u> between properties unless:</p> <p>(a)..</p> <p>(b)..</p> <p>(c) The maximum cap is not exceeded on any individual across the aggregated losses of the properties in the farming enterprise or nutrient user group.</p>
15.4.12	V3pLWRP-403	53683	Dairy Holdings Limited	Oppose	<p>Amend Policy 15.4.12 clause (a) and clause (b) as follows:</p> <p>(a) the property is part of a Farming Enterprise or a Nutrient User Group; and</p> <p>(b) the combined nitrogen loss calculation from all properties forming the Nutrient User Group <u>Farming Enterprise</u> does not exceed...</p>
15.4.12	V3pLWRP-454	64095	Department of Conservation	Support	Retain Policy 15.4.12 as notified
15.4.12	V3pLWRP-530	64075	Otaio Water User Group	Oppose	Amend Policies 15.4.10 to 15.4.14 where if the Zones have different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone.
15.4.12	V3pLWRP-711	56725	Fertiliser Association of New Zealand	Oppose	<p>Amend Policy 15.4.12 as follows:</p> <p>" Maintain water quality by restricting the movement <u>transfer</u> of nitrogen <u>nutrient discharge allocation</u> between properties unless:..."</p>
15.4.12	V3pLWRP-823	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Delete Policy 15.4.12
15.4.12	V3pLWRP-894	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.12 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-193].
15.4.13	V3pLWRP-36	64043	Roger and Lisa Small	Support	Supports Policy 15.4.13
15.4.13	V3pLWRP-135	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Policy 15.4.13</p> <p>[Original submission states delete Policy 5.4.13, which is assumed to be a typological error]</p>
15.4.13	V3pLWRP-194	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Clarify the intent of Policy 15.4.13. This may involve an amendment to the definition of Nutrient User Group to clarify that such a group exists only if approved by ECan through a specified process.
15.4.13	V3pLWRP-302	52267	Horticulture New Zealand	Oppose	<p>Amend Policy 15.4.13 as follows:</p> <p>Manage <u>Enable the use of nutrient user group to manage</u> nutrient losses <u>from the collective group.</u> by requiring applications for a resource consent to establish a Nutrient User Group to describe</p>
15.4.13	V3pLWRP-404	53683	Dairy Holdings Limited	Oppose	<p>Amend Policy 15.4.13 as follows:</p> <p>Manage nutrient losses by requiring application for resource consent to establish a Nutrient User group <u>Farming Enterprise</u> to describe:</p> <p>(a) the procedures and methods for recording nitrogen losses from properties within the Nutrient User Group <u>Farming Enterprise</u> ; and</p> <p>(b) the methods for redistributing <u>recalculating the combined</u> nitrogen <u>loss load</u> when a property joins or leaves the Nutrient User Group <u>Farming Enterprise</u> ; and</p> <p>(c) ...</p> <p>(d) ...</p>

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15.4.13	V3pLWRP-455	64095	Department of Conservation	Support	Retain Policy 15.4.13 as notified
15.4.13	V3pLWRP-531	64075	Otaio Water User Group	Oppose	Amend Policies 15.4.10 to 15.4.14 where if the Zones have different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone.
15.4.13	V3pLWRP-714	56725	Fertiliser Association of New Zealand	Oppose	Amend Policy 15.4.13 to clarify its intent, assuming the intent is to provide for management of nutrient loss by Nutrient User Group obtaining resource consent.
15.4.13	V3pLWRP-824	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Policy 15.4.13 to clarify the purpose of the NUG [Nutrient User Group], how aspects identified are to be implemented, and how an NUG can utilise the scheme proposed.
15.4.13	V3pLWRP-895	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter supports South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-194].
15.4.14	V3pLWRP-6	64011	Oceania Dairy Limited	Oppose	Amend Policy 15.4.14 [management of nutrient discharges within the command area of an irrigation scheme] to include an exemption for nitrogen losses from any activity that is subject to the conditions of a current consent.
15.4.14	V3pLWRP-37	64043	Roger and Lisa Small	Oppose	Seeks Policy 15.4.14 (a)-(d) be deferred until total loads re-calculated and re-negotiation of Maximum Caps and flexibility caps have been done. Amend Policy 15.4.14 (e) by deleting words 'partially and fully'.
15.4.14	V3pLWRP-195	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Policy 15.4.14 clause (b) because this could cause operational difficulties for developing [Irrigation] schemes.
15.4.14	V3pLWRP-369	53274	Central South Island Fish and Game	Oppose	Amend Policy 15.4.14 as follows: Nutrient discharges within the command area of an irrigation scheme are managed by requiring any discharge permit <u>consent</u> granted to an irrigation scheme to include...
15.4.14	V3pLWRP-456	64095	Department of Conservation	Support	Retain Policy 15.4.14 as notified
15.4.14	V3pLWRP-532	64075	Otaio Water User Group	Oppose	Seeks that Farm Enterprises and Nutrient User Groups are treated the same as Irrigation Schemes. Amend Policies 15.4.10 to 15.4.14 where if the Zones have different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone. [See submission points ID V3pLWRP- 520, 529, 530 and 531].
15.4.14	V3pLWRP-646	55552	Hunter Downs Development Company Limited	Support	Retain Policy 15.4.14 as notified.
15.4.14	V3pLWRP-718	56725	Fertiliser Association of New Zealand	Oppose	Amend Policy 15.4.14(e) to clarify its intent that the Irrigation scheme is required to implement controls which require the land manager to manage nutrient loss from a property to remain within limits proposed by the irrigation scheme.
15.4.14	V3pLWRP-826	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Delete Policy 15.4.14 condition (c) [not exceed maximum caps]
15.4.14	V3pLWRP-896	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.14 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-195]
15.4.15	V3pLWRP-38	64043	Roger and Lisa Small	Oppose	Seeks nutrient loss reduction be re-negotiated as per Tom Lambie's statement to NARG and Zone Committee.
15.4.15	V3pLWRP-136	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Replace Policy 15.4.15 as follows:

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					<u>Improve water quality in Wainono Lagoon and its value as mahinga kai by enabling augmentation or flushing of the lagoon and catchment restoration activities.</u>
15.4.15	V3pLWRP-196	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Policy 15.4.15 as follows: Improve water quality of the Waihao-Wainono Area by enabling augmentation of Wainono Lagoon and catchment restoration activities and in the absence of either require nutrient loss reductions beyond those achieved by good management practice .
15.4.15	V3pLWRP-372	53274	Central South Island Fish and Game	Oppose	Amend Policy 15.4.15 as follows: Improve water quality of the Waihao-Wainono Area by enabling augmentation of Wainono Lagoon and catchment restoration activities <u>by 2035</u> , and in the absence of either occurring require nutrient loss reductions beyond those achieved <u>with farm environment management plans in accordance with schedule 24B, which sets out and defines good environmental practice to reduce current nitrogen, phosphorus and microbial contaminant losses.</u> by good management practice.
15.4.15	V3pLWRP-457	64095	Department of Conservation	Support	Retain Policy 15.4.15 as notified
15.4.15	V3pLWRP-647	55552	Hunter Downs Development Company Limited	Support	Retain Policy 15.4.15 as notified.
15.4.15	V3pLWRP-719	56725	Fertiliser Association of New Zealand	Support	Retain Policy 15.4.15 as notified.
15.4.15	V3pLWRP-767	64135	Goldwyn Angus Limited	Oppose	Seeks more importance on testing and cleaning up the rivers and streams by putting limits on these. [Submitter identified Rule [probably policy] 15.4.15, but their decision sought is a general one for the plan.]
15.4.15	V3pLWRP-897	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.15 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-196].
15.4.16	V3pLWRP-197	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Policy 15.4.16 as follows: Rewording part (d) as follows: Net loss of significant indigenous biodiversity habitat and habitats of significant indigenous biodiversity is avoided and the application for a resource consent is accompanied by a management plan that describes how the wetland(s) will be maintained ; and Amend Policy part (e) as follows: <u>significant</u> adverse effects on people and property from raised groundwater levels and land inundation are avoided;
15.4.16	V3pLWRP-305	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.16 (b), (d) and (e) by inserting after the word 'avoided' the following: <u>or mitigated where avoidance is not practicable</u>
15.4.16	V3pLWRP-430	53856	Blue Cliffs Station	Oppose	Amend Policy 15.4.16(e) as follows: <u>Significant</u> adverse effects on people and property from raised groundwater levels and land inundation are avoided <u>or otherwise mitigated</u> ; and
15.4.16	V3pLWRP-618	64079	Michael Laming	Support	Retain Policy 15.4.16(e) as notified.
15.4.16	V3pLWRP-648	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.16 as follows: (e) adverse effects on people and property from raised groundwater levels and land inundation are avoided <u>or mitigated</u> ;
15.4.16	V3pLWRP-720	56725	Fertiliser Association of New Zealand	Oppose	Amend Policy 15.4.16 by combining clauses (d) and (f).

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15.4.16	V3pLWRP-898	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.16 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-197]
15.4.16	V3pLWRP-975	64076	Community and Public Health	Oppose	Amend Policy 15.4.16 by replacing the term " avoiding " with " <u>preventing</u> ". [Note: the term "avoided" and "avoidance" (rather than "avoiding") is used in this policy]
15.4.17	V3pLWRP-137	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Replace Policy15.4.17 as follows: <u>Encourage catchment restoration activities which will improve water quality and enhance mahinga kai in the Waihao-Wainono Lagoon and catchment including: protecting springheads, promoting indigenous biodiversity in riparian planting; the enhancement of natural wetlands and the creation of artificial wetlands; and the removal of fine sediments from waterways.</u>
15.4.17	V3pLWRP-476	64095	Department of Conservation	Oppose	Amend Policy 15.4.17 by inserting " <u>weed and pest control</u> ". [Submitter put relief sought against Policy 15.4.7 which is assumed to be a typographical error as submitter also refers to Policy 15.4.17 in submission]
15.4.17	V3pLWRP-533	64075	Otaio Water User Group	Oppose	Amend 15.4.17 with the addition of <u>all</u> farms. [Submission appears to be against incorrect policy, uncertain which provision the submitter is seeking to amend]
15.4.17	V3pLWRP-721	56725	Fertiliser Association of New Zealand	Oppose	Amend Policy 15.4.17 as follows: "Catchment restoration activities focus on the protection of springheads , the protection, establishment or enhancement of planted riparian margins, ...etc.
15.4.17	V3pLWRP-976	64076	Community and Public Health	Support	Retain Policy 15.4.[17]. [Note: Submitter appears to incorrectly refer to Policy 15.4.18 in the description text against the submission point for Policy 15.4.17]
15.4.18	V3pLWRP-477	64095	Department of Conservation	Oppose	Amend Policy 15.4.18 by including [consideration of effects on] " <u>threatened species</u> ".
15.4.18	V3pLWRP-535	64075	Otaio Water User Group	Support	Retain Policy 15.4.18 as notified.
15.4.19	V3pLWRP-199	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Policy 15.4.19 part (b) as follows: (b) utilizing water available from irrigation schemes before utilizing run-of-river takes , <u>taking into account the financial viability for the property concerned</u> Amend Policy 15.4.19 part (c) as follows: (c) avoiding the reallocation of any surrendered water <u>until such time as the water resource is no longer over-allocated</u> .
15.4.19	V3pLWRP-307	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.19(c) as follows: avoiding the reallocation of any surrendered water where there is over-allocation; and
15.4.19	V3pLWRP-458	64095	Department of Conservation	Support	Retain Policy 15.4.19 as notified
15.4.19	V3pLWRP-536	64075	Otaio Water User Group	Oppose	Amend Policy 15.4.19(b) by adding the following: <u>taking into account the financial viability for the property concerned</u>
15.4.19	V3pLWRP-899	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.19 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-199].

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15.4.20	V3pLWRP-201	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Retain Policy 15.4.20 (a) as notified. Amend Policy 15.4.20 (b) as follows: (b) <u>for new consents</u> , not exceeding the applicable allocation limit set out in Table 15(k) . <u>Consents renewals should be granted provided the volume and rate of take are reasonable according to Schedule 10 methodology</u> ; and
15.4.20	V3pLWRP-308	52267	Horticulture New Zealand	Oppose	Delete "demonstrated use" from Policy 15.4.20(a)
15.4.20	V3pLWRP-459	64095	Department of Conservation	Support	Retain Policy 15.4.20 as notified
15.4.20	V3pLWRP-653	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.20 to only refer to "reasonable use", calculated in accordance with Schedule 10.
15.4.20	V3pLWRP-901	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.20 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-201].
15.4.20	V3pLWRP-999	64090	Fonterra Co-operative Group Limited	Oppose	Amend Policy 15.4.20 as follows: Groundwater is sustainably managed within the Waihao Groundwater Allocation Zone by: (a) <u>for irrigation takes</u> , using reasonable or demonstrated use calculated in accordance with Schedule 10 to establish annual volume and maximum rate of take conditions and; (b) <u>for other takes, despite Policy 4.50(b)(i), establishing annual volume and maximum rate of take conditions on the basis of the amount of water that is reasonable and demonstrates efficiency use of water for the particular end use; and</u> (c) not exceeding the applicable allocation limit set out in Table 15(k). (d) aligning the term of the resource consent with Policy 15.4.35
15.4.21	V3pLWRP-7	64011	Oceania Dairy Limited	Oppose	Amend Policy 15.4.21 so that it is clear that it does not apply to Whitneys Creek groundwater allocation zone.
15.4.21	V3pLWRP-140	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete Policy 15.4.21(b) and replace with: (b) <u>There is no increase in the rate of take or annual volume; and</u> (c) <u>If the take is a stream-depleting groundwater take it complies with the minimum flows and any cessation of take rules required under Tables 15(g) to (l); ...</u> [Submitter does not specify what happens to the notified Policy 15.4.21(c)]
15.4.21	V3pLWRP-203	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Policy 15.4.21(b) to enable effective use of consented annual volumes.
15.4.21	V3pLWRP-309	52267	Horticulture New Zealand	Oppose	Delete 'demonstrated use' from Policy 15.4.21(a)
15.4.21	V3pLWRP-460	64095	Department of Conservation	Support	Retain Policy 15.4.21 as notified
15.4.21	V3pLWRP-537	64075	Otaio Water User Group	Oppose	Amend Policy 15.4.21(b) by inserting the following: <u>determining the annual volume but water may be spread over a greater or different land area.</u>
15.4.21	V3pLWRP-654	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.21 to only refer to "reasonable use", calculated in accordance with Schedule 10.

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15.4.21	V3pLWRP-902	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.21 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-203].
15.4.21	V3pLWRP-1000	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Policy 15.4.21 as follows:</p> <p>Outside the Waihao Groundwater Allocation Zone groundwater is sustainably managed by only granting resource consents that replace a lawfully established groundwater take where:</p> <p>a) <u>for irrigation takes</u>, the annual volume and maximum rate of take is based on reflects reasonable or demonstrated use calculated in accordance with Schedule 10 and;</p> <p>b) There is no increase in the area of land to be irrigated</p> <p><u>b) for other takes, despite policy 4.50(b)(i), the rate and volume of take reflects the amount of water that is reasonable and demonstrates efficient use of water for the particular end use.</u></p> <p>c) the term of the consent aligns with Policy 15.4.35.</p> <p>[Requested consequential amendment if V3pLWRP-987 is accepted]</p>
15.4.22	V3pLWRP-141	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Replace Policy 15.4.22 with the following:</p> <p><u>Any water permit to take, use, dam or divert water including any change of consent conditions on an existing water permit concerning rate, volume or timing of take, shall be assessed to ensure the amount of water taken is reasonable for the intended use in accordance with Schedule 10; and appropriate conditions relating to rate and timing of take and annual volume shall be imposed.</u></p>
15.4.22	V3pLWRP-204	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.22 as notified.
15.4.22	V3pLWRP-310	52267	Horticulture New Zealand	Oppose	Delete 'demonstrated use' from Policy 15.4.22
15.4.22	V3pLWRP-461	64095	Department of Conservation	Support	Retain Policy 15.4.22 as notified
15.4.22	V3pLWRP-538	64075	Otaio Water User Group	Support	Retain Policy 15.4.22 as notified.
15.4.22	V3pLWRP-651	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.22 to only refer to "reasonable use", calculated in accordance with Schedule 10.
15.4.22	V3pLWRP-903	64084	Willans Holdings / Coastal Farms Ltd	Support	Retain Policy 15.4.22 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-204].
15.4.22	V3pLWRP-1001	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Policy 15.4.22 as follows:</p> <p>Any application for a change in consent conditions concerning annual volume or rate of take or timing of the take shall be assessed, <u>if it is an irrigation take</u>, against reasonable or demonstrated use calculated in accordance with Schedule 10 <u>or, if it is not an irrigation take, on the basis of the amount of water that is reasonable and demonstrates efficient use of water for the particular end use.</u></p> <p>[Requested consequential amendment if V3pLWRP-987 is accepted]</p>
15.4.23	V3pLWRP-205	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Amend Policy 15.4.23 as follows:</p> <p>Surface water flows are improved by enabling an applicant to take deep groundwater provided the applicant holds a lawfully established surface water take or stream depleting groundwater take for an equal or greater rate and volume than is sought from the deep groundwater, and the surface</p>

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					<p>water take or stream depleting take is surrendered provided:</p> <p><u>(a) The volume of take will be that required to meet reasonable demand for the area of land (calculated according to method 2 of Schedule 10).</u></p> <p><u>(b) (a) there are no stream depletion effects to avoid stream depletion effects, the take will be from greater than 30 m depth;</u></p> <p>Re-letter parts (b) to (d) accordingly.</p>
15.4.23	V3pLWRP-311	52267	Horticulture New Zealand	Oppose	Delete 'demonstrated use' from Policy 15.4.23(c)
15.4.23	V3pLWRP-373	53274	Central South Island Fish and Game	Oppose	<p>Amend Policy 15.4.23 to include:</p> <p><u>The water resulting from any surrendered surface water and stream depleting groundwater takes in the catchment will not be reallocated and will be left in the river until such time as the catchment is no longer over allocated.</u></p> <p>[Unclear where within Policy 15.4.23 the text is to be]</p>
15.4.23	V3pLWRP-462	64095	Department of Conservation	Support	Retain Policy 15.4.23 as notified
15.4.23	V3pLWRP-539	64075	Otaio Water User Group	Oppose	<p>Amend Policy 15.4.23 as follows:</p> <p><u>"...an equal or greater rate and volume consented irrigated area..."</u></p>
15.4.23	V3pLWRP-652	55552	Hunter Downs Development Company Limited	Oppose	<p>Amend Policy 15.4.23 as follows:</p> <ul style="list-style-type: none"> to only refer to "reasonable use", calculated in accordance with Schedule 10 and by deleting reference to "demonstrated" in clause (c) and deleting clause (d).
15.4.23	V3pLWRP-905	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.23 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-205].
15.4.23	V3pLWRP-1002	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Policy 15.4.23 as follows:</p> <p>Surface water flows are improved by enabling an applicant to take deep groundwater provided the applicant holds a lawfully established surface water take or stream depleting groundwater take for an equal or greater rate and volume than is sought from deep groundwater, and the surface water take or stream depleting groundwater take is surrendered provided:</p> <p>(a) there are no stream depleting effects; and</p> <p>(b) the allocation limit described in Table 15(l) is not exceeded; and or</p> <p><u>(c) the take for an industrial or trade process and the subsequent use of water and an associated discharge to land results in a neutral or positive water balance; and</u></p> <p>(c)(d) <u>The annual volume and maximum rate of take, for the purpose of irrigation, is based upon reasonable or demonstrated use calculated in accordance with Schedule 10: or</u></p> <p><u>(e) The annual volume and maximum rate of take, for a purpose other than irrigation, is based upon amount of water that is reasonable and demonstrates efficient use of water for the particular end use.</u></p> <p>(d) The term of the consent aligns with policy 15.4.35.</p> <p>[Requested consequential amendment if V3pLWRP-987 is accepted]</p>
15.4.24	V3pLWRP-8	64011	Oceania Dairy Limited	Oppose	Amend Policy 15.4.24 so that it is clear that it does not apply to Whitneys Creek Groundwater Allocation Zone.

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15.4.24	V3pLWRP-208	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.24 as notified.
15.4.24	V3pLWRP-463	64095	Department of Conservation	Support	Retain Policy 15.4.24 as notified
15.4.24	V3pLWRP-542	64075	Otaio Water User Group	Support	Supports Policy 15.4.24.
15.4.24	V3pLWRP-656	55552	Hunter Downs Development Company Limited	Support	Retain policy 15.4.24 as notified.
15.4.24	V3pLWRP-906	64084	Willans Holdings / Coastal Farms Ltd	Support	Retain Policy 15.4.24 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-208].
15.4.24	V3pLWRP-1003	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Policy 15.4.24 as follows:</p> <p>Achieve the surface water and groundwater outcomes by only granting resource consents to take and use water where it is demonstrated that:</p> <p>a) the water permit will not exceed the allocation limits in Tables 15(f) to 15(i): <u>or and</u></p> <p>b) <u>the take is for an industrial or trade process and the subsequent use of water and an associated discharge to land results in a neutral or positive water balance; and</u></p> <p>c) the volume and rate of water to be taken <u>for the purpose of irrigation</u> is reasonable, determined in accordance with Schedule 10 <u>and, for water taken for other uses, the volume and rate of water taken is reasonable and demonstrates efficient use of water for the particular end use.</u></p>
15.4.25	V3pLWRP-59	64039	Gary Bruce	Oppose	Seeks that Policy 15.4.25 is amended so that existing consents [water permits] be allowed to continue unimpeded for their duration with a standard right of renewal, or if scheme water is compulsory, financial compensation is given.
15.4.25	V3pLWRP-209	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Amend Policy 15.4.25 as follows:</p> <p>Over-allocation of water is reduced by requiring applications for water permits affected by section 124-124C of the RMA to use irrigation scheme water, where available, to the fullest extent possible , <u>taking into account practicality and financial viability for the property concerned</u> .</p>
15.4.25	V3pLWRP-464	64095	Department of Conservation	Support	Retain Policy 15.4.25 as notified
15.4.25	V3pLWRP-543	64075	Otaio Water User Group	Oppose	<p>Amend Policy 15.4.25 by including the following words:</p> <p><u>taking into account the financial and practical viability for the property concerned</u></p>
15.4.25	V3pLWRP-657	55552	Hunter Downs Development Company Limited	Support	Retain Policy 15.4.25 as notified.
15.4.25	V3pLWRP-908	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.25 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-209].
15.4.26	V3pLWRP-210	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Delete Policy 15.4.26.</p> <p>If the policy is retained it should state that it applies to the abstraction of surface water and stream depleting groundwater.</p>
15.4.26	V3pLWRP-312	52267	Horticulture New Zealand	Oppose	<p>Amend Policy 15.4.26 by including provision for crop survival water.</p> <p>[See submission points V3 pLWRP- 275 to 279 regarding crop survival water]</p>
15.4.26	V3pLWRP-465	64095	Department of Conservation	Support	Retain Policy 15.4.26 as notified

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15.4.26	V3pLWRP-545	64075	Otaio Water User Group	Oppose	Amend Policy 15.4.26 by deleting the words 'seasonal volume'.
15.4.26	V3pLWRP-909	64084	Willans Holdings / Coastal Farms Ltd	Oppose-	Amend Policy 15.4.26 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-210].
15.4.27	V3pLWRP-60	64039	Gary Bruce	Oppose	Seeks a reduction in minimum flow requirement at "Bradshaws" [Lower Waihao River] to no more than half of that required in this proposal [Variation 3].
15.4.27	V3pLWRP-211	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.27 as notified.
15.4.27	V3pLWRP-374	53274	Central South Island Fish and Game	Support	Retain Policy 15.4.27 as notified.
15.4.27	V3pLWRP-466	64095	Department of Conservation	Support	Retain Policy 15.4.27 as notified
15.4.27	V3pLWRP-546	64075	Otaio Water User Group	Support	Retain Policy 15.4.27 as notified
15.4.27	V3pLWRP-910	64084	Willans Holdings / Coastal Farms Ltd	Support	Retain Policy 15.4.27 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-211].
15.4.28	V3pLWRP-142	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Policy 15.4.28 as follows: Facilitate aquifer recharge between 1 September and 30 April by only allowing the abstraction of 'B' allocation block water from the Otaio River when the flow at the Otaio Gorge is above the relevant 'B' allocation block minimum flow limits and the depth to water in bore J39/0255 is less ^{higher} than 3m below ground level.
15.4.28	V3pLWRP-212	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.28 as notified.
15.4.28	V3pLWRP-467	64095	Department of Conservation	Support	Retain Policy 15.4.28 as notified
15.4.28	V3pLWRP-547	64075	Otaio Water User Group	Support	Retain Policy 15.4.28 as notified.
15.4.28	V3pLWRP-911	64084	Willans Holdings / Coastal Farms Ltd	Support	Retain Policy 15.4.28 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-212].
15.4.29	V3pLWRP-143	64073	Ngāi Tahu and Nga Rūnanga	Support	Retain Policy 15.4.29 but renumber as 15.4.24.
15.4.29	V3pLWRP-213	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.29 as notified.
15.4.29	V3pLWRP-375	53274	Central South Island Fish and Game	Oppose	Amend Policy 15.4.29 to include the numerical groundwater block (Mm ³ /y) to (b), (c) and (d) as the sum of granted water permits at 1 May 2015.
15.4.29	V3pLWRP-468	64095	Department of Conservation	Support	Retain Policy 15.4.29 as notified
15.4.29	V3pLWRP-548	64075	Otaio Water User Group	Support	Retain Policy 15.4.29 as notified
15.4.29	V3pLWRP-912	64084	Willans Holdings / Coastal Farms Ltd	Support	Retain Policy 15.4.29 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-213].
15.4.30	V3pLWRP-61	64039	Gary Bruce	Oppose	Amend Policy 15.4.30 to allow the transfer of water permits between all property in one ownership not just where the transferred water is to be used for a community water supply [paraphrased].

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15.4.30	V3pLWRP-144	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Replace Policy 15.4.30 with the following: <u>Allow the temporary or permanent transfer of water permits to take surface water or groundwater provided that the transfer does not result in the abstraction of water or additional water to that already being abstracted.</u>
15.4.30	V3pLWRP-214	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Policy 15.4.30 by adding the words: <u>...or where the transfer can occur without increasing volume of allocated water used.</u>
15.4.30	V3pLWRP-267	63179	DairyNZ	Oppose	Amend policy 15.4.30 [to enable transfers provided that they do not result in additional water use on catchments/ zones that are fully or over allocated] to read: <u>Enable the transfer of ground and surface water permits except to the extent that such transfers would result in environmental flow and allocation limits being exceeded or further exceeded.</u>
15.4.30	V3pLWRP-317	52267	Horticulture New Zealand	Oppose	Amend Policy 15.4.30 by allowing transfers of water permits and not limiting this only to where the transferred water is to be used for community water supply [paraphrased].
15.4.30	V3pLWRP-406	53683	Dairy Holdings Limited	Oppose	Amend Policy 15.4.30 as follows: Meet environmental flow and allocation limits by only allowing the transfer of water permits (other than to the new owner of the same property at the same location), to occur where the transferred water is to be: (a) used for a community water supply; <u>or</u> (b) held by an Irrigation Scheme for the purposes of augmentation or environmental enhancement.
15.4.30	V3pLWRP-469	64095	Department of Conservation	Support	Retain Policy 15.4.30 as notified
15.4.30	V3pLWRP-549	64075	Otaio Water User Group	Support	Retain Policy 15.4.30 as notified
15.4.30	V3pLWRP-913	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.30 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-214].
15.4.30	V3pLWRP-977	64076	Community and Public Health	Support	Retain Policy 15.4.[30]. [Note: Submitter appears to incorrectly refer to Policy 15.4.27 in the description text against the submission point for Policy 15.4.30]
15.4.30	V3pLWRP-986	64090	Fonterra Co-operative Group Limited	Oppose	Amend Policy 15.4.30 [to enable transfers provided that they do not result in additional water use on catchments/ zones that are fully or over allocated] to read: <u>Enable the transfer of ground and surface water permits except to the extent that such transfers would result in environmental flow and allocation limits being exceeded or further exceeded.</u> [Consequential amendment requested if original relief not accepted] Amend Policy 15.4.30 as follows: Meet environmental flow and allocation limits by only allowing the transfer of water permits (other than to the new owner of the same property at the same location), to occur where: a) the transferred water is to be used for a community water supply; or b) the transferred water is, or will following transfer, be used for an industrial or trade process and result in a neutral or positive water balance.

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15.4.31	V3pLWRP-145	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Replace Policy 15.4.31 with the following: <u>Reserve the allocations set out in Table 15(f) for community drinking water supplies.</u>
15.4.31	V3pLWRP-215	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Policy 15.4.31 as notified.
15.4.31	V3pLWRP-470	64095	Department of Conservation	Support	Retain Policy 15.4.31 as notified
15.4.31	V3pLWRP-550	64075	Otaio Water User Group	Support	Retain Policy 15.4.31 as notified.
15.4.31	V3pLWRP-914	64084	Willans Holdings / Coastal Farms Ltd	Support	Retain Policy 15.4.31 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-215].
15.4.32	V3pLWRP-376	53274	Central South Island Fish and Game	Support	Retain Policy 15.4.32 as notified.
15.4.32	V3pLWRP-471	64095	Department of Conservation	Support	Retain Policy 15.4.32 as notified
15.4.32	V3pLWRP-658	55552	Hunter Downs Development Company Limited	Oppose	Amend Policy 15.4.32 as follows: Environmental benefits from the discharge of water for <u>augmentation and environmental purposes from Morven Glenavy Irrigation Scheme</u> into the lower reach of the Waiho River a <u>surface water body</u> are protected by avoiding the allocation of that discharged water for abstraction.
15.4.32	V3pLWRP-782	64039	Gary Bruce	Oppose	Seeks Policy 15.4.32 is amended to allow a portion of the Morven Glenavy Irrigation Scheme [environmental] discharge to be included in the flow limits for abstraction at "Bradshaws".
15.4.32	V3pLWRP-915	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Policy 15.4.32 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-216]. [Note V3pLWRP-216 has noted a <i>possible</i> typographical error therefore V3pLWRP-915 <i>could</i> be incorrect as a result]
15.4.33	V3pLWRP-146	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete Policy 15.4.33
15.4.33	V3pLWRP-318	52267	Horticulture New Zealand	Support	Retain Policy 15.4.33 as notified.
15.4.33	V3pLWRP-472	64095	Department of Conservation	Support	Retain Policy 15.4.33 as notified
15.4.34	V3pLWRP-473	64095	Department of Conservation	Support	Retain Policy 15.4.34 as notified
15.4.34	V3pLWRP-551	64075	Otaio Water User Group	Support	Retain Policy 15.4.34 as notified.
15.4.35	V3pLWRP-9	64011	Oceania Dairy Limited	Oppose	Amend Policy 15.4.35 [common catchment expiry dates for consents] to make an exemption for industrial takes to ensure certainty of supply.
15.4.35	V3pLWRP-216	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Policy 15.4.35 part (b) or extend the duration to at least 20 years. [Submitter put relief sought against Policy 15.4.32(b) which is assumed to be a typographical error as Policy 15.4.35(b) relates to consent duration which is discussed in their reasoning's].
15.4.35	V3pLWRP-268	63179	DairyNZ	Oppose	Delete Policy 15.4.35 or if Council determined not to delete the policy, amend Policy 15.4.35 to read: Integrated catchment management is facilitated by: (a) applying a common catchment expiry to <u>all consents to take and use surface or ground water for irrigation</u> of:

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					If the primary relief (i.e. deletion of Policy 15.4.35) is accepted, undertake consequential amendments to Policies, 15.4.20, 15.4.21, 15.4.23 as required to deal with concerns around common catchment expiry.
15.4.35	V3pLWRP-319	52267	Horticulture New Zealand	Oppose	Delete Policy 15.4.35
15.4.35	V3pLWRP-377	53274	Central South Island Fish and Game	Support	Retain Policy 15.4.35 as notified.
15.4.35	V3pLWRP-474	64095	Department of Conservation	Support	Retain Policy 15.4.35 as notified
15.4.35	V3pLWRP-552	64075	Otaio Water User Group	Oppose	Amend Policy 15.4.35(b) by replacing 10 years with <u>15 years</u> .
15.4.35	V3pLWRP-620	64079	Michael Laming	Oppose	Amend Policy 15.4.35 to clarify that the recommended durations only apply to farming activities and water permits but does not apply to works in the bed of rivers.
15.4.35	V3pLWRP-692	63247	Ballance Agri-Nutrients Limited	Oppose	<p>Delete and replace Policy 15.4.35 as follows (or similar):</p> <p><u>"Integrated management is facilitated by:</u></p> <p style="padding-left: 40px;"><u>(a) Imposing a review condition of all resource consents that are granted in the South Coastal Canterbury Area, that authorise the discharge of nutrients to ground and/or surface water; and</u></p> <p style="padding-left: 40px;"><u>(b) Aligning all review conditions to the following dates:</u></p> <p style="padding-left: 80px;"><u>(i) The 1st of January 2030 for any resource consent within the Waihao-Wainono Area, and every 10 years thereafter;</u></p> <p style="padding-left: 80px;"><u>(ii) The 1st of January 2031 for any resource consent within the Northern Streams Area and every 10 years thereafter;</u></p> <p style="padding-left: 80px;"><u>(iii) The 1st of January 2032 for any resource consent within the Morven-Sinclairs Area and every 10 years thereafter; and</u></p> <p style="padding-left: 40px;"><u>(c) Imposing, as appropriate, mechanisms such as adaptive management and regular 'best practicable option reviews', on resource consents in the South Canterbury Area that authorise the discharge of nutrients to ground and/or surface water, and ensuring consistency in the mechanisms that are imposed on all of the resource consents."</u></p>
15.4.35	V3pLWRP-987	64090	Fonterra Co-operative Group Limited	Oppose	<p>Delete Policy 15.4.35.</p> <p>Amend Policy 15.4.35 [in the event that Policy 15.4.35 is not deleted] as the following:</p> <p>Integrated catchment management is facilitated by:</p> <p style="padding-left: 40px;">(a) applying a common catchment expiry <u>to all consents to take and use surface or groundwater</u> of:</p> <p>Amend Policy 15.4.35 [if the above relief is not accepted] by adding the following matter:</p> <p style="padding-left: 40px;"><u>(d) Despite (a) to (c) above enable consents to be granted for large capital intensive activities for up to 35 years.</u></p>
15.4.35	V3pLWRP-1011	55552	Hunter Downs Development Company Limited	Oppose	Delete Policy 15.4.35.
Rules 15.5	V3pLWRP-23	64044	Ellis-Lea Farms (2000) Ltd	Oppose	Supports and adopts the submission of South Canterbury Province Federated Farmers on Section 15.5 Rules.
Rules 15.5	V3pLWRP-243	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend the note above Rule 15.5.26 to include regional Rules 5.113 and 5.114 (which allow for small takes).
Rules 15.5	V3pLWRP-246	64848	South Canterbury Province, Federated Farmers of New	Oppose	Insert a new Rule that provides for a reasonable amount of water to be taken without minimum flows applying if it is for the purpose of animal welfare or hygiene.

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Rules 15.5	V3pLWRP-252	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Insert a new Rule enabling takes outside the present groundwater allocation zones
Rules 15.5	V3pLWRP-277	52267	Horticulture New Zealand	Oppose	<p>Insert an additional consent assessment matter as follows:</p> <p><u>Within the South Coastal Canterbury Area: The need for crop survival water as determined using Schedule 10 Method 1.</u></p> <p>[Submitter does not note which rule this assessment would go with].</p>
Rules 15.5	V3pLWRP-329	63179	DairyNZ	Oppose	<p>Insert a new Rule 15.5.40A as follows:</p> <p><u>The temporary or permanent transfer, in whole or in part, (other than to the new owner of the site to which the take and use of water relates and where the location of the take and use of water does not change) of a water permit to take or use surface water or groundwater that does not meet condition 1 or condition 2 of Rule 15.5.40 must not under section 136 of the RMA be approved, in the same was as if it were a prohibited activity.</u></p> <p>[insertion of new rules is a consequence of amendments to Rule 15.5.40 in submission point V3pLWRP-290]</p>
Rules 15.5	V3pLWRP-335	52267	Horticulture New Zealand	Oppose	Insert a new rule to enable flexibility of land use through a controlled or permitted activity transfer rule to be overseen by Council to provide for transfer of nutrients within or between properties, farming enterprise or nutrient user groups within water management unit where it can be demonstrated the transfer will not cause an increase that exceeds the provision for the total nutrient load limit for the water management unit.
Rules 15.5	V3pLWRP-408	53683	Dairy Holdings Limited	Oppose	<p>Insert a new permitted activity rule making it clear that the use of land where a property receives water from an Irrigation Scheme is a permitted activity where the Irrigation Scheme holds a resource consent under Rule 15.5.11.</p> <p>[Submission point made in connection with submitter's request to amend Rule 15.5.2 in V3pLWRP-407].</p>
Rules 15.5	V3pLWRP-413	53683	Dairy Holdings Limited	Oppose	<p>Insert a new Rule 15.5.9A after Rule 15.5.9 as follows:</p> <p><u>15.5.9A The use of land for a farming activity that forms part of a Farming Enterprise that does not comply with one or more of the conditions 1, 3, 4 or 5 of Rule 15.5.9 is a non-complying activity.</u></p>
Rules 15.5	V3pLWRP-435	53856	Blue Cliffs Station	Oppose	<p>Insert new rule after Rule 15.5.38 to allow for the taking and use of water for the purpose of domestic, stock water, washdown water and other small takes for commercial, research or industrial use which is outside the area of community water supply scheme subject to a resource consent or as a permitted activity subject to certain conditions such as reasonable use for domestic and stock water and maximum daily volume for other uses.</p> <p>[See submission point V3 pLWRP-434 for consequential change]</p>
Rules 15.5	V3pLWRP-519	64075	Otaio Water User Group	Oppose	<p>Amend the nutrient rules by:</p> <ul style="list-style-type: none"> • Specifying the OVERSEER® version used to determine the Nitrogen caps in the variation • Accommodating the changing OVERSEER® versions through a schedule or by some other effective means by a group established for this role and in agreement with ECan • Given the concerns with OVERSEER®, potentially MGM with Flexibility caps be used instead. <p>Seeks this is resolved and agreed to prior to a hearing.</p> <p>[Applies to Rules 15.5.1-18]</p>
Rules 15.5	V3pLWRP-544	64095	Department of Conservation	Oppose	<p>Insert a new rule to give effect to the ZIP Addendum recommendation 1.1 for the protection of Canterbury mudfish habitat that reads:</p> <p><u>The use of land within 3 meters of the bed and banks of the river, stream, creek or drain for the purposes of planting or removal of vegetation or disturbance of the bed between the upstream and downstream sites listed in schedule X (enclosed), is a discretionary activity.</u></p> <p>[see full submission for schedule X "Schedule of known Canterbury mudfish (Neochanna burrowsius) habitats in the South Coastal Canterbury sub-regional area."]</p>
Rules 15.5	V3pLWRP-553	64075	Otaio Water User Group	Support	Retain the Rule Index table as notified, ensure it is legally binding.

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Rules 15.5	V3pLWRP-556	64075	Otaio Water User Group	Oppose	Amend Rules where if the Zones have different nutrient loads, that this can be averaged across the zones, rather than having the minimum or having to show specific compliance with each zone.
Rules 15.5	V3pLWRP-561	64075	Otaio Water User Group	Oppose	Insert a New Rule that will provide for reasonable and efficient amount of water to be taken without the need for minimum flows to apply if it is for the purpose of animal welfare and hygiene reasons.
Rules 15.5	V3pLWRP-564	64075	Otaio Water User Group	Oppose	Amend the note above Rule 15.5.26 to include rules 5.113 and 5.114.
Rules 15.5	V3pLWRP-621	64079	Michael Laming	Oppose	Amend the Variation by including the word <u>Flood Protection and Drainage Bylaw</u> under the 'Wainono Restoration Project' and 'Habitat Restoration Works' or once at the beginning of the rule section as it is relevant to all of these areas.
Rules 15.5	V3pLWRP-641	55552	Hunter Downs Development Company Limited	Oppose	<p>Insert a new Rule 15.5.3A as follows:</p> <p><u>15.5.3A Following the augmentation of Wainono Lagoon, the use of land for a farming, except any land that is part of a Nutrient User Group or Farming Enterprise, or land that is within the command area of an Irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme, that does not comply with condition 1(a) of Rule 15.5.2 is a controlled activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of either the nitrogen baseline or the flexibility cap for the respective area as set out in:</u></p> <p><u>(a) column B or C for any land within the Waihao-Wainono plains; and</u></p> <p><u>2. In the Waihao-Wainono Area the use of land is for an existing farming activity and the property nutrient loss is less than the maximum cap for the relevant soil type, as set out in Table 15(n) is not exceeded; or</u></p> <p><u>3. In the Waihao-Wainono Area the use of land is for a new farming activity and the property nutrient loss is less than the maximum cap as set out in Table 15(n) for the relevant soil types is not exceeded; and</u></p> <p><u>4. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A, and is submitted with the application for a resource consent; and</u></p> <p><u>5. The farming activity is operating at good management practice as set out in Schedule 24b; and</u></p> <p><u>6. The nitrogen loss on the property does not exceed the greater of:</u></p> <p><u>(a) that subject to a targeted rating under the Local Government (Rating) Act 2002 to contribute to the provision and operation of Wainono Lagoon augmentation; or</u></p> <p><u>(b) that described in any relevant "Nitrogen Loss Agreement" with the provider of Wainono Lagoon augmentation water, where a copy of that agreement has been submitted with the application for resource consent.</u></p>
Rules 15.5	V3pLWRP-643	55552	Hunter Downs Development Company Limited	Oppose	<p>The series of amendments [presumably in submission points V3pLWRP-640, V3pLWRP-641 and V3pLWRP-642] need to be included with the equivalent rules for establishment of farm enterprises and nutrient user groups (which are currently treated separately under Rules 15.5.6 to 15.5.10).</p> <p>Alternatively, a single rule could be included to address individual farming activities, nutrient user groups and farming enterprise as suggested in submission points noted above.</p>
Rules 15.5	V3pLWRP-644	55552	Hunter Downs Development Company Limited	Oppose	<p>Insert a new Rule as follows:</p> <p><u>[x] When considering compliance with any nitrogen loss limit included in rules 15.5.1 to 15.5.40 (along with supporting tables), version[X] of OVERSEER® shall be used. If OVERSEER® is updated:</u></p> <p><u>(a) the most recent version of OVERSEER® shall be used to calculate an equivalent nitrogen loss limit (the <i>Equivalent Limit</i>) using the same input parameters as were used to calculate the nitrogen limit calculated using version [X] of OVERSEER®; and</u></p> <p><u>(b) the Equivalent limit shall be used for the purposes of determining compliance.</u></p>

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					The submitter suggests an alternative solution is to include a footnote in each individual Table [Tables 15(m) 15(n) 15(o) and 15(p)]. Refer to submission points V3pLWRP-671, V3pLWRP-672, V3pLWRP-673 and V3pLWRP-674.
Rules 15.5	V3pLWRP-659	55552	Hunter Downs Development Company Limited	Oppose	<p>Insert a new Rule (15.5.11A) as follows:</p> <p><u>The use of land for a farming activity on a property that is supplied with water by an irrigation scheme, is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The irrigation scheme holds a nitrogen discharge consent for the area where the property is located.</u></p>
Rules 15.5	V3pLWRP-684	61382	NZ Pork Industry Board	Oppose	Delete definition and all references to "Maximum cap" because this cannot be defined as the only available tools have a margin of error of up to 30%.
Rules 15.5	V3pLWRP-704	56725	Fertiliser Association of New Zealand	Oppose	<p>Insert a new rule that provides an exemption for existing activities on extremely light soils to meet the maximum cap by 2030, and provide for this to be met over the longer term.</p> <p>[Reference made to Policies 15.4.5 and 15.4.6]</p>
Rules 15.5	V3pLWRP-737	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of the baseline more allocation to low emitting properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load calculations for stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-749	64067	Keith and Christine Adams	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of the baseline more allocation to low emitting properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load calculations stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-763	64135	Goldwyn Angus Limited	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> low level development of existing low emitting properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of the baseline more allocation to low emitting properties over time immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load calculations for stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-790	64121	David Sleigh	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> low level development of existing dryland properties flexibility in current farming system if baseline is above the flexibility cap increase the number of years in calculation of the baseline more allocation to dryland properties over time immediately adopting the flexibility cap to dryland farmers up to 15kg for stable low emitting farming systems extend, the years over which the calculation of nitrogen baselines are derived and provide the

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					maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-805	64120	Guy Wigley	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> • low level development of existing low emitting properties • flexibility in current farming system if baseline is above the flexibility cap • increase the number of years in calculation of the baseline • more allocation to low emitting properties over time • immediately adopting the flexibility cap to low emitting farmers up to 15kg - subject to variations in OVERSEER® and total load calculations • for stable low emitting farming systems, extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-812	64125	Beef and Lamb New Zealand Ltd	Oppose	<p>Amend Rules 15.5.2 to 15.5.5 to:</p> <ul style="list-style-type: none"> • provide for development of existing dryland and properties with small areas of irrigation • provide for flexibility in current farming system if benchmark is above flexibility cap • increase number of years in calculation of [nitrogen] baseline • provide for more allocation to dryland/low N emission properties over time • immediately adopt flexibility cap to up to 15kg N/Ha • for stable dryland farming systems where emissions exceed 15kgN/Ha extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline • provide for incorporating updated OVERSEER® versions, soils data and the Matrix of Good Management.
Rules 15.5	V3pLWRP-827	64042	John Gardner	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> • low level development of existing low emitting properties • flexibility in current farming system if baseline is above the flexibility cap • increase the number of years in calculation of the baseline • more allocation to low emitting properties over time • immediately adopting the flexibility cap to dryland farmers up to 15kg • for stable low emitting farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-838	64080	Daniel Studholme	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> • low level development of existing dryland and properties with a small area of irrigation as part of predominately dryland properties • flexibility in current farming system if benchmark is above the flexibility cap • increase the number of years in calculation of baseline • more allocation to dryland properties over time • immediately adopting the flexibility cap to dryland farmers up to 15kg - subject to variations in OVERSEER® and total load • For stable dryland farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline
Rules 15.5	V3pLWRP-848	64099	David Gardner	Oppose	<p>Amend Rules 15.5.2 - 15.5.5 to provide for:</p> <ul style="list-style-type: none"> • low level development of existing low emitting properties • flexibility in current farming system if baseline is above the flexibility cap • increase the number of years in calculation of the baseline • more allocation to dryland properties over time • immediately adopting the flexibility cap to dryland farmers up to 15kg • For stable dryland farming systems extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline

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Rules 15.5	V3pLWRP-994	64090	Fonterra Co-operative Group Limited	Oppose	<p>Insert a new Rule 15.5.40A as follows:</p> <p><u>15.5.40A The temporary or permanent transfer, in whole or in part, (other than to the new owner of the site to which the take and use of water relates and where the location of the take and use of water does not change) of a water permit to take or use surface water or groundwater that does not meet condition 1 or condition 2 of Rule 15.5.40 must not under section 136 of the RMA be approved, in the same was as if it were a prohibited activity.</u></p> <p>[insertion of new rules is a consequence of amendments to Rule 15.5.40 in submission point V3pLWRP-290]</p>
15.5.1	V3pLWRP-39	64043	Roger and Lisa Small	Oppose	<p>Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful.</p> <p>Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.</p>
15.5.1	V3pLWRP-147	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Amend Rule 15.5.1 by adding a new condition after the words "permitted activity" :</p> <p>...provided the following condition is complied with:</p> <p><u>(a) The estimated nitrogen losses from the property do not exceed the flexibility caps set out in Table 15(m).</u></p>
15.5.1	V3pLWRP-480	64095	Department of Conservation	Support	Retain Rule 15.5.1 as notified.
15.5.1	V3pLWRP-722	56725	Fertiliser Association of New Zealand	Support	Retain Rule 15.5.1 as notified.
15.5.1	V3pLWRP-829	56708	Ravensdown Fertiliser Co-operative Limited	Support	Retain Rule 15.5.1 as notified.
15.5.1	V3pLWRP-916	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.1 as outlined in South Canterbury Province Federated Farmers submission [see submission points V3pLWRP-172 to 174].
15.5.2	V3pLWRP-10	64011	Oceania Dairy Limited	Oppose	Amend Rule 15.5.2 to require farming activities to operate at good management practice as defined in the most recent version of the Matrix of Good Management (MGM) and achieve the nitrogen losses for the farming type, soil type and climate shown in that version of the MGM.
15.5.2	V3pLWRP-40	64043	Roger and Lisa Small	Oppose	<p>Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful.</p> <p>Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.</p>
15.5.2	V3pLWRP-148	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Amend Rule [1]5.5.2 by adding another clause to condition (1) as follows:</p> <p><u>and the nitrogen baseline does not exceed the maximum nitrogen caps in Table 15(n).</u></p>
15.5.2	V3pLWRP-233	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Amend condition 2 in Rule 15.5.2 as follows:</p> <p>The nitrogen loss calculation for any part of the property within the Morven-Sinclairs Area does not exceed the <u>Good Management Practice</u> nitrogen <u>loss benchmark defined by the MGM project</u> baseline; and...</p>
15.5.2	V3pLWRP-269	63179	DairyNZ	Oppose	<p>Delete Rule 15.5.2 and replace with four new rules as follows:</p> <p><u>Rule 15.5.2</u></p> <p><u>The use of land for an Individual Farming Activity in the Waihao-Wainono Plain is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or</u></p> <p style="padding-left: 40px;"><u>a. 10kg nitrogen per hectare per annum; or</u></p> <p style="padding-left: 40px;"><u>b. When augmentation has occurred in the preceding year:</u></p> <p style="padding-left: 80px;"><u>i. 15 nitrogen per hectare per annum; or</u></p>

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					<p><u>ii. 17 nitrogen per hectare per annum if after 1 January 2030; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2A</u></p> <p><u>The use of land for an Individual Farming Activity in the Waihao-Wainono Hills is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or 5kg N/ha/yr; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2B</u></p> <p><u>The use of land for an Individual Farming Activity in the Northern Streams Plains is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or,</u></p> <p><u>a. 15kg nitrogen per hectare per annum or</u></p> <p><u>b. 17kg nitrogen per hectare per annum if after 1 January 2030; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2C</u></p> <p><u>The use of land for an Individual Farming Activity in the Northern Streams Hill is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or 5kg nitrogen per hectare per annum; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2D</u></p> <p><u>The use of land for an Individual Farming Activity in the Morven Sinclairs Area is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the nitrogen baseline; and</u></p> <p><u>2. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p>Seeks a consequential amendment to insert a definition of “Individual farming activity” to differentiate farming activities that are part of a Farming Enterprise or Nutrient User Group [see submission point V3pLWRP-224].</p>
15.5.2	V3pLWRP-270	63179	DairyNZ	Oppose	Replace the term "maximum cap" with the term " <u>maximum nitrogen loss rate</u> ".

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					[a consequence of decision requested in relation to Rule 15.5.2 in submission point V3pLWRP-269]
15.5.2	V3pLWRP-320	52267	Horticulture New Zealand	Support	Retain Rule 15.5.2 as notified.
15.5.2	V3pLWRP-378	53274	Central South Island Fish and Game	Oppose	<p>Amend Rule 15.5.2 condition 5 as follows:</p> <p>The farming activity is operating at good management practice as set out in Schedule 24B<u>The practices in Schedule 24B are being implemented and the information required is recorded in accordance with Schedule 24B, and supplied to Canterbury Regional Council on request; or</u></p> <p>Insert a new condition 6, as follows:</p> <p><u>6. A Farm Environment Plan has been prepared and is being implemented in accordance with Schedule 7 Part A, and supplied to the Canterbury Regional Council on request.</u></p>
15.5.2	V3pLWRP-407	53683	Dairy Holdings Limited	Oppose	<p>Amend Rule 15.5.2 as follows:</p> <p>The use of land for a farming activity, except any land and property that is part of a Nutrient User Group or Farming Enterprise, or a property that which is supplied with water by an Irrigation Sscheme, is a permitted activity provided the following conditions are met: ...</p>
15.5.2	V3pLWRP-418	64072	David Linton	Oppose	<p>Amend Rule 15.5.2 to provide for:</p> <ul style="list-style-type: none"> low level development of existing dryland and partly irrigated properties realisation of existing consents more allocation to dryland properties over time <p>and increase the number of years in the calculation of the nitrogen baseline.</p>
15.5.2	V3pLWRP-431	53856	Blue Cliffs Station	Oppose	<p>Amend Rule 15.5.2, condition (1) (b) and (c) as follows:</p> <p>(b) columns B or C of Table 15(m) for any land within the Waihao-Wainono Plains; or columns E or F of Table 15(m) for any land within the Northern Streams Hill; <u>or Column G of Table 15(m) for any part of the property within the Northern Stream Hill</u> and</p> <p>(c) column D of Table 15(m) for any land within the Waihao-Wainono Hill, or Column G of Table 15(m) for any part of the property within the Northern Stream Hill ; and</p>
15.5.2	V3pLWRP-484	64095	Department of Conservation	Support	Retain Rule 15.5.2 as notified.
15.5.2	V3pLWRP-612	64077	New Zealand Deer Farmers' Association South Canterbury North Otago Branch	Oppose	<p>Amend Rule 15.5.2 by change the flexibility cap in the Hill Area to 10 kgN/ha/year - the same as Waihao-Wainono plains Area without augmentation</p> <p>Opposes condition 5 of Rule 15.5.2 and requirements that place extra costs on low nitrogen emitters and prefers all farming activities operating above maximum caps be required to operate at GMP or better.</p> <p>Clarify how all farming activities are to operate at GMP or better.</p>
15.5.2	V3pLWRP-640	55552	Hunter Downs Development Company Limited	Oppose	<p>Amend Rule 15.5.2 as follows:</p> <p>The use of land for a farming activity, except any land that is part of a Nutrient User Group or Farming Enterprise, or land that is within the command area of an Irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme , a property that is supplied with water by an irrigation scheme is a permitted activity provided the following conditions are met:</p> <p>1. The nitrogen loss calculation does not exceed the greater of either the nitrogen baseline or the flexibility cap for the respective area as set out in:</p> <p>(a) column A of Table 15(m) for any land within the Waihao-Wainono Plains; or</p> <p>(b) column B or C of Table 15(m) for any land within the Waihao-Wainono Plains; or columns E or F of Table 15(m) for any land within the Northern Streams Plains; or</p>

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					<p>(c) column D of Table 15(m) for any land within the Waihao-Wainono Hill, or column G of Table 15(m) for any part of the property within the Northern Streams Hill; and</p> <p>2. The nitrogen loss calculation for any part of the property within the Morven-Sinclairs Area does not exceed the nitrogen baseline; and</p> <p>3. In the Northern Streams Area and Waihao-Wainono Area the use of land is for an existing farming activity and <u>the property nutrient loss is less than the maximum cap for the relevant soil type of that property</u> , as set out in Table 15(n) is not exceeded; or</p> <p>4. In the Northern Streams Area and Waihao-Wainono Area the use of land is for a new farming activity and <u>the property nutrient loss is less than the maximum cap as set out in Table 15(n) for the relevant soil type of that property</u> is not exceeded; and</p> <p>5. The farming activity is operating at good management practice as set out in Schedule 24b.</p>
15.5.2	V3pLWRP-723	56725	Fertiliser Association of New Zealand	Support	Retain Rule 15.5.2 as notified.
15.5.2	V3pLWRP-830	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Retain the permitted activity status of Rule 15.5.2, with the following amendments:</p> <ul style="list-style-type: none"> Review the flexibility cap so that it achieves the intent of providing flexibility, particularly in the Hill Areas; If the flexibility cap is retained, review Rule 15.5.2 to ensure it is implemented consistently to reflect the red, orange, green zoning of the PCLWRP; Delete the reference to the maximum cap in Rule 15.5.2 and include reference to the not exceeding the nitrogen baseline and adoption of MGM values and the meeting of nitrogen loss rates under good management practices within a specified time frame. <p>[See submission point ID V3pLWRP-768 to 770 for related amendments to ‘farming activity’, ‘existing farming activity’ and ‘new farming activity’.]</p>
15.5.2	V3pLWRP-871	64013	Graham Patterson	Oppose	<p>Amend Rule 15.5.2 to address the following:</p> <ul style="list-style-type: none"> clear explanation and standardised guidelines of GMP clear structure for the verification/auditing process structure for GMP sensible time frames for compiling evidence to support a farm's GMP/Farm plan not requiring drystock farmers to produce an OVERSEER® nutrient budget every year. <p>[Submission refers to Rule 15.5.2 condition 5 and Rule 15.5.3]</p>
15.5.2	V3pLWRP-920	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.2 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-233].
15.5.2	V3pLWRP-988	64090	Fonterra Co-operative Group Limited	Oppose	<p>Delete Rule 15.5.2 and replace with four separate rules as follows:</p> <p><u>Rule 15.5.2</u></p> <p><u>The use of land for an Individual Farming Activity in the Waihao-Wainono Plain is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or</u></p> <p><u>a. 10kg nitrogen per hectare per annum; or</u></p> <p><u>b. When augmentation has occurred in the preceding year:</u></p> <p><u>i. 15[kg] nitrogen per hectare per annum; or</u></p> <p><u>ii. 17[kg] nitrogen per hectare per annum if after 1 January 2030; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in</u></p>

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					<p><u>Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2A</u></p> <p><u>The use of land for an Individual Farming Activity in the Waihao-Wainono Hills is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or 5kg N/ha/yr; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2B</u></p> <p><u>The use of land for an Individual Farming Activity in the Northern Streams Plains is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or,</u></p> <p style="padding-left: 40px;"><u>a. 15kg nitrogen per hectare per annum or</u></p> <p style="padding-left: 40px;"><u>b. 17kg nitrogen per hectare per annum if after 1 January 2030; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2C</u></p> <p><u>The use of land for an Individual Farming Activity in the Northern Streams Hill is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the greater of the nitrogen baseline or 5kg nitrogen per hectare per annum; and</u></p> <p><u>2. From 1 January 2030, the nitrogen loss calculation does not exceed the maximum nitrogen loss rate set out for the relevant soil type set out in Table 15(n); and</u></p> <p><u>3. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p><u>Rule 15.5.2D</u></p> <p><u>The use of land for an Individual Farming Activity in the Morven Sinclairs Area is a permitted activity provided the following conditions are met:</u></p> <p><u>1. The nitrogen loss calculation does not exceed the nitrogen baseline; and</u></p> <p><u>2. The farming activity is operating at good management practice as set out in Schedule 24b.</u></p> <p>Create a definition of “Individual farming activity” to differentiate farming activities that are part of a Farming Enterprise or Nutrient User Group [see submission point V3pLWRP-629].</p> <p>Insert reference [as a consequential amendment to submission V3pLWRP-1006] to discharges from industrial or trade process wastewater systems being a discretionary activity.</p>
15.5.2	V3pLWRP-989	64090	Fonterra Co-operative Group Limited	Oppose	<p>Replace the term "maximum cap" with the term " <u>maximum nitrogen loss rate</u> ".</p> <p>[a consequence of decision requested in relation to Rule 15.5.2 in submission point V3pLWRP-988]</p>

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15.5.3	V3pLWRP-41	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.3	V3pLWRP-149	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend the reference to Rule 15.4.2
15.5.3	V3pLWRP-234	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.3 as follows: Delete the reference to "total catchment load limits" in matter for discretion 1. Reword matter for discretion 6 to read: <u>Whether the soil map in Variation 3 accurately reflects the distribution of soil on the property for the purpose of applying maximum caps.</u>
15.5.3	V3pLWRP-271	63179	DairyNZ	Oppose	Amend Rule 15.5.3 as follows: The use of land for an individual farming activity , except any land that is part of a nutrient User Group or Farming Enterprise, or land that is within the command area of an irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme and any land within the command area of an irrigation scheme where the nutrient loss is not being managed by the scheme, that: <u>1. Does not meet any of the conditions 1(a), 1(e) or 4 of Rule 15.5.2, the following:</u> <u>a) Condition 2 or 3 of Rule 15.5.2; or</u> <u>b) Condition 2 or 3 of Rule 15.5.2A; or</u> <u>c) Condition 1, 2 or 3 of Rule 15.5.2B; or</u> <u>d) Condition 2 or 3 of Rule 15.5.2C; or</u> <u>e) Condition 1 or 2 of Rule 15.5.2D; or</u> <u>2. Is within the Orange or Green nutrient allocation zone and does not does meet any of the following:</u> <u>a) Condition 1, 2 or 3 of Rule 15.5.2; or</u> <u>b) Condition 1 of Rule 15.5.2A; or</u> <u>c) Condition 1 of Rule 15.5.2C, is a restricted discretionary activity provided the following condition is met:</u> 1. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A, and is submitted with the application for resource consent. The exercise of discretion is restricted to the following matters: 1. Whether the nitrogen loss from the farming activity will result in the total catchment load limits as per table 15(p) or the flexibility caps in Table 15(m) being exceeded. The nitrogen loss rates to be applied to the property and rate at which they should reduce to achieve the maximum nitrogen loss rate; and 2. The quality of, compliance with and auditing of the Farm Environment Plan; and 3. The proposed management practices to avoid or minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land; and 4. The potential effect of the land use on surface and groundwater quality and sources of drinking water; and 5. The appropriateness of the actions and timeframes described in the Farm Environment Plan in achieving the maximum cap loss rates <u>nitrogen loss rate</u> in Table 15(n); and

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					<p>6. The <u>soil type having regard to the</u> quality and appropriateness of any soil mapping carried out for the property; and</p> <p>7. The potential adverse effects of the activity on Ngai Tahu cultural values; <u>and</u></p> <p><u>8. The matters set out in Policy 15.4.5.</u></p> <p>Or such similar wording that would allow for any updated load limit to be relevant at the time of consent rather than (necessarily) those limits currently included in Table 15 (p).</p> <p>[Submitter also seeks corresponding amendments to Rules 15.5.4 and 15.5.5. See also submission point ID V3pLWRP-251 for amendment proposed to Table 15(n)]</p>
15.5.3	V3pLWRP-321	52267	Horticulture New Zealand	Support	Retain Rule 15.5.3 as notified.
15.5.3	V3pLWRP-432	53856	Blue Cliffs Station	Support	Amend Rule 15.5.3 by changing the reference to Rule 15.4.2 to <u>Rule 15.5.2</u> .
15.5.3	V3pLWRP-485	64095	Department of Conservation	Support	Retain Rule 15.5.3 as notified.
15.5.3	V3pLWRP-614	64077	New Zealand Deer Farmers' Association South Canterbury North Otago Branch	Oppose	Amend Rule 15.5.3 so that 'Rule 15.4.2' is amended to read 'Rule 15.5.2'.
15.5.3	V3pLWRP-725	56725	Fertiliser Association of New Zealand	Oppose	<p>Amend Rule 15.5.3 as follows:</p> <p>"...that do not meet any of the conditions of Rule 15.4.2 <u>Rule 15.5.2</u> excluding conditions 1(a), 1(c) or 4 of Rule 15.5.2..."</p>
15.5.3	V3pLWRP-840	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Amend Rule 15.5.3 as follows:</p> <ul style="list-style-type: none"> Correct the reference in the fourth line; amend Rule 15.4.2 to read 15. <u>5</u> .2 ; Include a new matter of discretion which would require the farming activity to comply with MGM values by a specified timeframe; Delete the first matter of discretion in Rule 15.5.3; Amend the fifth matter of discretion to read: <p><u>"The appropriateness of the actions and time frames described in the Farm Environment Plan in achieving the nitrogen baseline; the flexibility cap loss rates in Table 15(m); or the maximum cap loss rates good management practice values in Table 15(n) (to be included at a later date) (whichever is relevant) ; and"</u></p> <ul style="list-style-type: none"> Delete the sixth matter of discretion.
15.5.3	V3pLWRP-873	64013	Graham Patterson	Oppose	<p>Amend Rule 15.5.3 to address the following:</p> <ul style="list-style-type: none"> clear explanation and standardised guidelines of GMP clear structure for the verification/auditing process structure for GMP sensible time frames for compiling evidence to support a farm's GMP/Farm plan Not requiring drystock farmers to produce an OVERSEER® nutrient budget every year. <p>[Submission refers to Rule 15.5.2 condition 5 and Rule 15.5.3]</p>
15.5.3	V3pLWRP-921	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.3 as outlined in Canterbury Province Federated Farmers submission [see submission point V3-pLWRP-234].
15.5.3	V3pLWRP-978	64076	Community and Public Health	Support	Retain Rule 15.5.3 as notified.

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15.5.3	V3pLWRP-990	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Rule 15.5.3 as follows:</p> <p>Rule 15.5.3 The use of land for an individual farming activity ,except any land that is part of a nutrient User Group or Farming Enterprise, or land that is within the command area of an irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme and any land within the command area of an irrigation scheme where the nutrient loss is not being managed by the scheme, that:</p> <p><u>1. Does not meet any of the conditions 1(a), 1(e) or 4 of Rule 15.5.2, the following:</u></p> <p><u>a) Condition 2 or 3 of Rule 15.5.2; or</u></p> <p><u>b) Condition 2 or 3 of Rule 15.5.2A; or</u></p> <p><u>c) Condition 1, 2 or 3 of Rule 15.5.2B; or</u></p> <p><u>d) Condition 2 or 3 of Rule 15.5.2C; or</u></p> <p><u>e) Condition 1 or 2 of Rule 15.5.2D; or</u></p> <p><u>2. Is within the Orange or Green nutrient allocation zone and does not does meet any of the following:</u></p> <p><u>a) Condition 1, 2 or 3 of Rule 15.5.2; or</u></p> <p><u>b) Condition 1 of Rule 15.5.2A; or</u></p> <p><u>c) Condition 1 of Rule 15.5.2C, is a restricted discretionary activity provided the following condition is met:</u></p> <p>1. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A, and is submitted with the application for resource consent.</p> <p>The exercise of discretion is restricted to the following matters:</p> <p>1. Whether the nitrogen loss from the farming activity will result in the total catchment load limits as per table 15(p) or the flexibility caps in Table 15(m) being exceeded. The nitrogen loss rates to be applied to the property and rate at which they should reduce to achieve the maximum nitrogen loss rate; and</p> <p>2. The quality of, compliance with and auditing of the Farm Environment Plan; and</p> <p>3. The proposed management practices to avoid or minimise the discharge of nitrogen, phosphorus, sediment and microbiological contaminants to water from the use of land; and</p> <p>4. The potential effect of the land use on surface and groundwater quality and sources of drinking water; and</p> <p>5. The appropriateness of the actions and timeframes described in the Farm Environment Plan in achieving the maximum cap loss rates <u>nitrogen loss rate</u> in Table 15(n); and</p> <p>6. The <u>soil type having regard to the</u> quality and appropriateness of any soil mapping carried out for the property; and</p> <p>7. The potential adverse effects of the activity on Ngai Tahu cultural values; <u>and</u></p> <p><u>8. The matters set out in Policy 15.4.5.</u></p> <p>Or such similar wording that would allow for any updated load limit to be the relevant at the time of consent rather than (necessarily) those limits currently included in Table 15 (p).</p> <p>Make corresponding amendments to Rules 15.5.4 and 15.5.5.</p> <p>See also amendment proposed to Table 15(n).</p>

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15.5.4	V3pLWRP-42	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.4	V3pLWRP-322	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.4 to a Discretionary Activity.
15.5.4	V3pLWRP-486	64095	Department of Conservation	Support	Retain Rule 15.5.4 as notified.
15.5.4	V3pLWRP-642	55552	Hunter Downs Development Company Limited	Oppose	Amend Rule 15.5.4 as follows: The use of land for a farming activity, except any land that is part of a Nutrient User Group or Farming Enterprise, or land that is within the command area of an Irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme, that does not meet condition 1 of 15.5.3 or Rule 15.5.3A is a non-complying activity.
15.5.4	V3pLWRP-724	56725	Fertiliser Association of New Zealand	Support	Retain Rule 15.5.4 as notified.
15.5.4	V3pLWRP-860	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.4 to be a discretionary activity instead of a non-complying activity.
15.5.5	V3pLWRP-43	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.5	V3pLWRP-237	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.5 to be <u>non-complying</u> activity status for Waihao-Wainono Plains and Waihao-Wainono Hill, and <u>discretionary</u> activity status or Northern Streams Hill.
15.5.5	V3pLWRP-287	63179	DairyNZ	Oppose	Amend Rule 15.5.5 as follows: The use of land for an Individual Farming Activity, except any land that is part of a Nutrient User Group or Farming Enterprise, or land that is within the command area of an irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme and any land within the command area of an irrigation scheme where the nutrient loss is not being managed by the scheme, that is within the Red nutrient allocation zone and that does not meet one or more of conditions 1(a), 1(c) or 4 of Rule 15.5.2 : <u>1. Condition 1, 2 or 3 of Rule 15.5.2; or</u> <u>2. Condition 1 of Rule 15.5.2A; or</u> <u>3. Condition 1 of Rule 15.5.2C.</u> <u>Is a prohibited activity</u> [consequential changes due to requested changes to Rule 15.5.2 and 15.5.3 in submission points V3pLWRP-269 and V3pLWRP-271]
15.5.5	V3pLWRP-323	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.5 to a Non-complying activity
15.5.5	V3pLWRP-419	64072	David Linton	Oppose	Amend Rule 15.5.5 to provide for: <ul style="list-style-type: none"> low level development of existing dryland and partly irrigated properties realisation of existing consents more allocation to dryland properties over time and increase the number of years in the calculation of the nitrogen baseline.
15.5.5	V3pLWRP-487	64095	Department of Conservation	Support	Retain Rule 15.5.5 as notified.

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15.5.5	V3pLWRP-850	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.5 to be a non-complying activity instead of a prohibited activity.
15.5.5	V3pLWRP-922	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.5 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-237].
15.5.5	V3pLWRP-946	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.5 as follows: "... prohibited discretionary activity"
15.5.5	V3pLWRP-991	64090	Fonterra Co-operative Group Limited	Oppose	Amend Rule 15.5.5 as follows: The use of land for <u>an Individual Farming Activity</u> , except any land that is part of a Nutrient User Group or Farming Enterprise, or land that is within the command area of an irrigation Scheme where the nutrient loss from the farming activity is being managed by the scheme and any land within the command area of an irrigation scheme where the nutrient loss is not being managed by the scheme, that is within the Red nutrient allocation zone and that does not meet one or more of conditions 1(a), 1(c) or 4 of Rule 15.5.2 : <u>1. Condition 1, 2 or 3 of Rule 15.5.2; or</u> <u>2. Condition 1 of Rule 15.5.2A; or</u> <u>3. Condition 1 of Rule 15.5.2C.</u> <u>Is a prohibited activity</u> <u>[consequential changes due to requested changes to Rule 15.5.2 and 15.5.3 in submission points V3pLWRP-990 and V3pLWRP-988]</u>
15.5.6	V3pLWRP-44	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.6	V3pLWRP-238	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend condition 3 of Rule 15.5.6 as follows: The nitrogen loss calculation for the farming enterprise does not exceed the <u>cumulative</u> respective nitrogen baseline for <u>the each</u> land areas forming part of the farming enterprise;
15.5.6	V3pLWRP-324	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.6 as follows: <ul style="list-style-type: none"> Delete condition 3 Amend condition 4 by deleting 'Surface Water Allocation Zone' and replacing it with 'nutrient discharge allocation area'. Amend to a Restricted Discretionary activity and include matters of discretion that take into account the rotational nature of the operation and industry good management practice.
15.5.6	V3pLWRP-409	53683	Dairy Holdings Limited	Oppose	Delete Rule 15.5.6.
15.5.6	V3pLWRP-433	53856	Blue Cliffs Station	Oppose	Delete condition 3 of Rule 15.5.6.
15.5.6	V3pLWRP-488	64095	Department of Conservation	Support	Retain Rule 15.5.6 as notified.
15.5.6	V3pLWRP-864	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.6 as follows:

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					<ul style="list-style-type: none"> Make Rule 15.5.6 a restricted discretionary activity [not discretionary] with the matters of discretion those matters [conditions] already listed; Amend the intent of Rule 15.5.6 to be in accordance with Policies 15.4.10, 15.4.11 and 15.5.12, in that flexibility in nutrient management is enabled if a farm is part of a Farming Enterprise where nitrogen losses can exceed their nitrogen baselines subject to a resource consent application and FEP; Delete Condition 4 [requirement to be located in the same Surface Water allocation Zone]; Review the complexity of the rule regime in light of the ZIP Addendum request for a simple framework.
15.5.6	V3pLWRP-923	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.6 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-238].
15.5.6	V3pLWRP-947	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.6 to remove ambiguity in its meaning and remove inconsistency between provisions (2) and (3). For example, delete condition (3) and replace with the following: <u>"The aggregated nitrogen loss calculation for the parcels of land held in single or multiple ownership (whether or not held in common ownership) forming the farming enterprise has not increased above the aggregated nitrogen baseline for those parcels of land"</u>
15.5.7	V3pLWRP-45	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.7	V3pLWRP-327	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.7 to a Discretionary activity.
15.5.7	V3pLWRP-410	53683	Dairy Holdings Limited	Oppose	Delete Rule 15.5.7
15.5.7	V3pLWRP-489	64095	Department of Conservation	Support	Retain Rule 15.5.7 as notified.
15.5.7	V3pLWRP-869	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.7 to be a discretionary activity [instead of non-complying]
15.5.7	V3pLWRP-948	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.7 by combining with Rule 15.5.8 as follows: The use of land for a farming activity as part of a Farming Enterprise that does not comply with <u>any</u> condition 4 of Rule 15.5.6 is a non-complying activity. OR The use of land for a farming activity as part of a Farming Enterprise that does not comply with <u>any</u> condition 4 of Rule 15.5.6 is a <u>discretionary non-complying</u> activity
15.5.8	V3pLWRP-46	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.8	V3pLWRP-150	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Rule 15.5.8 so that non-compliance with Rule 15.5.6(4) is a non-complying activity.
15.5.8	V3pLWRP-241	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.8 as follows: <u>non-complying prohibited</u> activity
15.5.8	V3pLWRP-328	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.8 to a Non-complying activity. [The submission states Rule 13.5.20, however it is requested under the title Rule 15.5.8]
15.5.8	V3pLWRP-411	53683	Dairy Holdings Limited	Oppose	Delete Rule 15.5.8

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15.5.8	V3pLWRP-491	64095	Department of Conservation	Support	Retain Rule 15.5.8 as notified.
15.5.8	V3pLWRP-870	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.8 to be a non-complying activity [instead of prohibited]
15.5.8	V3pLWRP-924	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.8 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-241].
15.5.8	V3pLWRP-949	56725	Fertiliser Association of New Zealand	Oppose	Delete Rule 15.5.8 [consequential amendment, see submission point V3pLWRP-948]
15.5.9	V3pLWRP-47	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.9	V3pLWRP-303	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.9 by: <ul style="list-style-type: none"> including matters from Policy 15.4.13(a)-(d) as matters of conditions in Rule 15.5.9 deleting "Surface Water Allocation Zone" in condition 3 and replacing with " <u>nutrient discharge allocation area</u> "
15.5.9	V3pLWRP-412	53683	Dairy Holdings Limited	Oppose	<p>Amend Rule 15.5.9 as follows:</p> <p>15.5.9 The use of land for a farming activity that forms part of a Nutrient User Group <u>Farming Enterprise</u> is a discretionary activity provided the following conditions are met:</p> <p>1. A management plan is submitted with the application for resource consent, which sets out:</p> <ul style="list-style-type: none"> (a) the properties forming the Nutrient User Group <u>Farming Enterprise</u> ; and (b) a map showing the location of all properties forming part of the Nutrient User Group <u>Farming Enterprise</u> ; and (c) the legal description of all properties and the legal names of the property owners forming part of the Nutrient User Group <u>Farming Enterprise</u>; and (d) the method by which nitrogen losses will be managed and accounted for within the Nutrient User Group <u>Farming Enterprise</u> ; and (e) the method by which nitrogen losses will be redistributed upon any property or any part of the property withdrawing from the Nutrient User Group <u>Farming Enterprise</u> ; and (f) how the Nutrient User Group <u>Farming Enterprise</u> will ensure each property complies with the maximum caps set out in Table 15(n); and <p><u>2. The nitrogen loss calculation for the Farming Enterprise does not exceed the sum of either:</u></p> <ul style="list-style-type: none"> <u>(i) the flexibility cap for the respective area; or</u> <u>(ii) the nitrogen baselines for the respective area whichever is the greater</u> <p>3. A Farm Environment Plan has been prepared for each property in the Nutrient User Group <u>Farming Enterprise</u> in accordance with Schedule 7 Part A and is submitted with the application for resource consent; and</p> <p>3.4. All properties within the Nutrient User Group <u>Farming Enterprise</u> are located within the same Surface Water Allocation Zone; and</p> <p>4.5. No property within the Nutrient User Group <u>Farming Enterprise</u> is part of an Irrigation Scheme or a Farming Enterprise.</p>

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15.5.9	V3pLWRP-492	64095	Department of Conservation	Support	Retain Rule 15.5.9 as notified.
15.5.9	V3pLWRP-695	63247	Ballance Agri-Nutrients Limited	Oppose	Replace Rule 15.5.9(2) as follows (or similar): "A detailed template of a Farm Environment Plan has been prepared in accordance with Schedule 7. The template will both apply to, and be populated to accurately reflect the operations of each property in the Nutrient User Group (within a prescribed timeframe that reflects the resource needed (and available) to complete the number of Farm Environment Plans that are to be prepared), and is submitted with the application for resource consent."
15.5.9	V3pLWRP-872	56708	Ravensdown Fertiliser Co-operative Limited	Support	Retain Rule 15.5.9 as notified.
15.5.9	V3pLWRP-950	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.9 as follows: <u>restricted</u> discretionary activity.
15.5.10	V3pLWRP-48	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.10	V3pLWRP-152	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Rule 15.5.10 so that non-compliance with Rule 15.5.9(1)(f) or (g) is a prohibited activity and non-compliance with any other part of Rule 15.5.9 is a non-complying activity. [Submitter has referenced 15.5.9(1)(g) which does not exist]
15.5.10	V3pLWRP-414	53683	Dairy Holdings Limited	Oppose	Amend Rule 15.5.10 as follows: The use of land for a farming activity that forms part of a Nutrient User Group <u>Farming Enterprise</u> that does not comply with one or more of the condition §2 of it in Rule 15.5.9 is a prohibited activity. [See submission points V3 pLWRP-412 and V3 pLWRP-413 for suite of changes]
15.5.10	V3pLWRP-493	64095	Department of Conservation	Support	Retain Rule 15.5.10 as notified.
15.5.10	V3pLWRP-875	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.10 to be a non-complying activity [instead of prohibited activity status]
15.5.10	V3pLWRP-951	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.10 as follows: <u>discretionary</u> prohibited activity
15.5.11	V3pLWRP-49	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.11	V3pLWRP-153	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Delete Rule 15.5.11 condition (2).
15.5.11	V3pLWRP-494	64095	Department of Conservation	Support	Retain Rule 15.5.11 as notified.
15.5.11	V3pLWRP-660	55552	Hunter Downs Development Company Limited	Oppose	Amend Rule 15.5.11 as follows: The discharge of nutrients onto or into land within the command area of an Irrigation Scheme in circumstances which may result in contaminants entering water and where the property is supplied with water by an irrigation scheme is a discretionary activity provided the following conditions are met: 1. The nitrogen load limits in Table 15(p) are not exceeded; and 2. The application for resource consent does not include any land that is part of a Nutrient User Group or Farming Enterprise.

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15.5.11	V3pLWRP-877	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.11 by making the activity status permitted or Delete Rule 15.5.11.
15.5.11	V3pLWRP-952	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.11 as follows: <u>restricted</u> discretionary activity [submitter put relief sought against Rule 15.5.9 which is assumed to be a typographical error as submission refers to Rule 15.5.11]
15.5.12	V3pLWRP-50	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.12	V3pLWRP-242	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.12 as follows: <u>non-complying</u> prohibited activity
15.5.12	V3pLWRP-495	64095	Department of Conservation	Support	Retain Rule 15.5.12 as notified.
15.5.12	V3pLWRP-925	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.12 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-242].
15.5.12	V3pLWRP-953	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.12 as follows: " prohibited <u>discretionary</u> activity "
15.5.13	V3pLWRP-51	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.13	V3pLWRP-497	64095	Department of Conservation	Support	Retain Rule 15.5.13 as notified.
15.5.13	V3pLWRP-900	56708	Ravensdown Fertiliser Co-operative Limited	Support	Retain Rule 15.5.13 as notified.
15.5.13	V3pLWRP-954	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.13 as follows: phosphorous <u>phosphorus</u>
15.5.14	V3pLWRP-52	64043	Roger and Lisa Small	Oppose	Seeks for the recalculation of total load and the re-negotiation of the flexibility caps before Rules 15.5.1-15.5.14 become lawful. Seeks permitted activity status for the emission of the nitrogen discharge of up to 15kg/ha and controlled activity status for above 15kg/ha.
15.5.14	V3pLWRP-498	64095	Department of Conservation	Support	Retain Rule 15.5.14 as notified.
15.5.14	V3pLWRP-904	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Rule 15.5.14 to be a discretionary activity [instead of non-complying]
15.5.14	V3pLWRP-955	56725	Fertiliser Association of New Zealand	Oppose	Amend Rule 15.5.14 as follows: phosphorous <u>phosphorus</u>
15.5.15	V3pLWRP-499	64095	Department of Conservation	Support	Retain Rule 15.5.15 as notified.
15.5.15	V3pLWRP-1005	64090	Fonterra Co-operative Group Limited	Oppose	Amend Rule 15.5.15 as follows:

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					<p>The use of land for a community wastewater treatment system and the discharge of sewage sludge, bio-solids and treated sewage effluent from a community wastewater treatment system and the discharge of sewage sludge and bio-solids from a domestic on-site wastewater treat system into or onto land, or into or onto land in circumstances where a contaminant may enter water is a discretionary activity provided the following conditions are met:</p> <p>1. The discharge <u>is from a community wastewater treatment system and</u>, in addition to the all lawfully established existing <u>wastewater treatment system</u> discharges does not exceed the nitrogen load limit in Table 15(o) for community sewage systems; and or</p> <p>2. <u>The discharge is from a domestic on-site wastewater treatment system or community wastewater system serving a single property; and</u></p> <p>3. The best practicable option is used for the treatment and discharge.</p>
15.5.16	V3pLWRP-501	64095	Department of Conservation	Support	Retain Rule 15.5.16 as notified.
15.5.17	V3pLWRP-11	64011	Oceania Dairy Limited	Oppose	<p>Amend Rule 15.5.17 to provide Oceania Dairy Limited with an industrial allocation of 40t N/yr on top of the farming allocation.</p> <p>[Also see submission point V3-pLWRP-14]</p>
15.5.17	V3pLWRP-502	64095	Department of Conservation	Support	Retain Rule 15.5.17 as notified.
15.5.17	V3pLWRP-693	63247	Ballance Agri-Nutrients Limited	Support	Retain Rule 15.5.17 as notified.
15.5.17	V3pLWRP-926	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. [Submitter references South Canterbury Province Federated Farmers submission, however Federated Farmers did not submit on Rule 15.5.17].
15.5.17	V3pLWRP-1007	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Rule 15.5.17 as follows:</p> <p>Despite Rules 15.5.1 to 15.5.12, the discharge of any wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewage, into or onto land, or into or onto land in circumstances where a contaminant may enter water is a discretionary activity provided the following conditions are met.</p> <p>1. The discharge in addition to all lawfully established existing discharges <u>from trade and industrial processes</u> does not exceed the nitrogen load limit in Table 15(o) for industrial or trade processes; or</p> <p>2. <u>The nitrogen loss from the discharge in combination with any other activity, including farming, occurring on the land, is less than any authorised nitrogen loss from the activity that is being replaced; and</u></p> <p>23- For all discharges, the best practicable option is used for the treatment and discharge.</p>
15.5.18	V3pLWRP-504	64095	Department of Conservation	Support	Retain Rule 15.5.18 as notified.
15.5.19	V3pLWRP-154	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Rule 15.5.19 and replace with the following:</p> <p><u>In the South Canterbury Coastal Area region-wide rules 5.68, 5.69, 5.70 and 5.71 also apply to permanently flowing drains, but not to subsurface drains.</u></p>
15.5.19	V3pLWRP-359	53274	Central South Island Fish and Game	Oppose	<p>Amend Rule 15.5.19 as follows:</p> <p>Any reference to the bed of a lake, river or wetland in Rules 5.68, 5.69, 5.70 and 5.71 also includes a drain <u>and ephemeral waterways</u> , but does not...</p>
15.5.19	V3pLWRP-506	64095	Department of Conservation	Support	Retain Rule 15.5.19 as notified.
15.5.19	V3pLWRP-866	64013	Graham Patterson	Oppose	<p>Seeks that fencing is not required for all waterways, and specifically not for high country, extensive farms and extensive deer farming operations.</p> <p>[Original submission lodged against Variation 3 as a whole but seeks an amendment to Policy 15.4.1 and Rule 15.5.19]</p>

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15.5.20	V3pLWRP-155	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Rule 15.5.20 as follows: ... (4) Each area of disturbance land is stabilised <u>immediately upon the completion of the disturbance, and is re-contoured and replanted to a state similar to or better than its previous state</u> within 10 days of completion of the disturbance; and ... (6) No vegetation used for flood control or bank stabilisation is disturbed, removed, damaged or destroyed except by or on behalf of the person or agency responsible for maintaining that vegetation for flood control purposes <u>with the written approval of the Canterbury Regional Council</u> . Add a new condition 7 as follows: <u>Where any indigenous vegetation is removed, it shall be replaced with indigenous vegetation of the same or similar species.</u>
15.5.20	V3pLWRP-527	64095	Department of Conservation	Oppose	Amend Rule 15.5.20 by inserting a new condition (7) to read: <u>7. The activity is undertaken between November and March inclusive</u>
15.5.20	V3pLWRP-622	64079	Michael Laming	Oppose	Amend Rule 15.5.20 condition (1) and (6) as follows: 1. ... or 50m from any defence against water, <u>or within a drainage scheme network</u> flood protection works ; or closer where <u>unless</u> there is written evidence... 6. destroyed except by or on behalf of, <u>or there is written evidence that permission has been obtained from,</u> the person or agency...
15.5.20	V3pLWRP-661	55552	Hunter Downs Development Company Limited	Support	Retain Rule 15.5.20 as notified.
15.5.21	V3pLWRP-528	64095	Department of Conservation	Oppose	Amend Rule 15.5.21 by inserting a new condition to read: <u>The activity is undertaken between November and March inclusive</u>
15.5.21	V3pLWRP-623	64079	Michael Laming	Oppose	Amend Rule 15.5.21 by inserting two new matters of discretion as follows: <u>8. Adverse effects on bank stability, erosion and capacity</u> <u>9. Adverse effects on people and property due to flooding and/or reduced drainage and drainage scheme network maintenance.</u>
15.5.21	V3pLWRP-662	55552	Hunter Downs Development Company Limited	Support	Retain Rule 15.5.21 as notified.
15.5.22	V3pLWRP-158	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Rule 15.5.22 matter of discretion (8) by adding the words: <u>Or the ability to exercise kaitiakitanga;</u>
15.5.22	V3pLWRP-557	64075	Otaio Water User Group	Oppose	Clarify the intent of Rule 15.5.22 [Submitter refers to Policy]
15.5.22	V3pLWRP-624	64079	Michael Laming	Oppose	Amend Rule 15.5.22 by inserting two new matters of discretion as follows: <u>8. Adverse effects on bank stability, erosion and capacity</u> <u>9. Adverse effects on people and property due to flooding and/or reduced drainage and drainage scheme network maintenance.</u>
15.5.22	V3pLWRP-979	64076	Community and Public Health	Support	Retain Rule 15.5.22 as notified.

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15.5.23	V3pLWRP-558	64075	Otaio Water User Group	Oppose	Clarify the intent of Rule 15.5.23. [Submitter refers to Policy]
15.5.23	V3pLWRP-663	55552	Hunter Downs Development Company Limited	Support	Retain Rule 15.5.23 as notified.
15.5.24	V3pLWRP-534	64095	Department of Conservation	Oppose	Amend Rule 15.5.24 by inserting new conditions and matter of discretion: New condition (7): <u>7. The turbidity of the discharge does not exceed 6 NTUs where the water enters the lagoon at median or lower Waihao River flows.</u> New condition (8): <u>8. The wetland is not located on land managed by the Department of Conservation and does not have any significant adverse effects on land managed by the Department.</u> New matter of discretion (10): <u>10. Rate and volume of the discharge</u>
15.5.24	V3pLWRP-664	55552	Hunter Downs Development Company Limited	Oppose	Delete condition 5 of Rule 15.5.24.
15.5.24	V3pLWRP-980	64076	Community and Public Health	Support	Retain Rule 15.5.24(2) as notified.
15.5.25	V3pLWRP-507	64095	Department of Conservation	Support	Retain Rule 15.5.25 as notified.
15.5.25	V3pLWRP-665	55552	Hunter Downs Development Company Limited	Support	Retain Rule 15.5.25 as notified.
15.5.26	V3pLWRP-159	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Rule 15.5.26 as follows: The take and use of groundwater with a direct, high or moderate stream depletion effect or the take and use <u>of</u> surface water from any waterbody <u>which is provided for that is not listed</u> in Tables 15(f) to 15(j) <u>but does not comply with the provisions in those table inclusive</u> is a prohibited activity. <u>The take and use of surface water or groundwater from any waterbody which is not provided for in Table 15(f) to (j) is a non-complying activity.</u>
15.5.26	V3pLWRP-245	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.26 as follows: The take and use of groundwater <u>for irrigation</u> with a high...
15.5.26	V3pLWRP-289	63179	DairyNZ	Oppose	Amend Rule 15.5.26 as follows: <u>Except as provided in Rules 5.111, 5.112 and 5.115</u> , the take and use of groundwater with a direct, high or moderate ion stream depletion effect or the take and use <u>of</u> surface water from any waterbody that is not listed in Table 15(f) to 15(j) inclusive is a prohibited activity
15.5.26	V3pLWRP-509	64095	Department of Conservation	Support	Retain Rule 15.5.26 as notified.
15.5.26	V3pLWRP-560	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.26 as follows: The take and use of groundwater <u>for irrigation</u> with a ...
15.5.26	V3pLWRP-666	55552	Hunter Downs Development Company Limited	Oppose	Amend Rule 15.5.26 to be a non-complying activity.

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15.5.26	V3pLWRP-927	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.26 as outlined in South Canterbury Province Federated Farmers submission [see submission points V3pLWRP- 245].
15.5.26	V3pLWRP-992	64090	Fonterra Co-operative Group Limited	Oppose	Amend Rule 15.5.26 as follows: <u>Except as provided in Rules 5.111, 5.112 and 5.115</u> , the take and use of groundwater with a direct, high or moderate ion stream depletion effect or the take and use <u>of</u> surface water from any waterbody that is not listed in Table 15(f) to 15(j) inclusive is a prohibited activity
15.5.27	V3pLWRP-247	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Rule 15.5.27 and defer to Rule 5.123. In the event that Rule 15.5.7 is not deleted, delete condition 2 (ii) and amend condition 2(i) so that all of the Schedule 10 methodologies are available both before and after 20 Dec 2021.
15.5.27	V3pLWRP-331	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.27 by adding as a matter of discretion the following: <u>Demonstration of efficient use</u>
15.5.27	V3pLWRP-434	53856	Blue Cliffs Station	Oppose	Amend Rule 15.5.27 as follows: Except as provided for in Rules 15.5.34 to <u>15.5.39</u> ... [See submission point V3pLWRP- 435 for change to Rule 15.5.39].
15.5.27	V3pLWRP-540	64095	Department of Conservation	Oppose	Amend Rule 15.5.27 by inserting the word " <u>activity</u> " after restricted discretionary. Amend discretion matter 8 to "cross refer to Schedule 2 (Fish Screen Standards and Guidelines) of the Land and Water Plan."
15.5.27	V3pLWRP-567	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.27 [no specific decision sought]
15.5.27	V3pLWRP-928	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.27 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-247].
15.5.28	V3pLWRP-248	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Rule 15.5.28 unless a satisfactory definition of wetland is developed.
15.5.28	V3pLWRP-510	64095	Department of Conservation	Support	Retain Rule 15.5.28 as notified.
15.5.28	V3pLWRP-570	64075	Otaio Water User Group	Oppose	Seeks clarification how a wetland (and associated values) is identified.
15.5.29	V3pLWRP-249	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Rule 15.5.29 pending deletion of condition 2(ii) of Rule 15.5.27 and amendment of condition 2(i) Rule 15.5.27, as requested in submission point V3 pLWRP-247
15.5.29	V3pLWRP-511	64095	Department of Conservation	Support	Retain Rule 15.5.29 as notified.
15.5.29	V3pLWRP-573	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.9 [No specific decision sought]
15.5.29	V3pLWRP-929	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.29 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-249].
15.5.30	V3pLWRP-12	64011	Oceania Dairy Limited	Oppose	Amend Rule 15.5.30 to include an additional condition for takes from the Whitneys Creek Groundwater Allocation Zone.

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15.5.30	V3pLWRP-250	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete conditions 2(ii) and 4(ii) of Rule 15.5.30. Amend condition 4(i) so that all of the Schedule 10 methodologies are available both before and after 20 Dec 2021.
15.5.30	V3pLWRP-332	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.30 by adding as a matter of discretion the following: <u>Demonstration of efficient use</u>
15.5.30	V3pLWRP-512	64095	Department of Conservation	Support	Retain Rule 15.5.30 as notified.
15.5.30	V3pLWRP-575	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.30 as follows: <ul style="list-style-type: none"> Delete condition (2)(ii); and Insert reference to financial availability
15.5.30	V3pLWRP-930	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.30 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-250 and 252].
15.5.31	V3pLWRP-253	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.31 by changing the activity status from prohibited to <u>non-complying</u> .
15.5.31	V3pLWRP-513	64095	Department of Conservation	Support	Retain Rule 15.5.31 as notified.
15.5.31	V3pLWRP-579	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.31 by replacing prohibited activity with non-complying activity.
15.5.31	V3pLWRP-1008	64821	L&M Coal Mount Somers Limited	Oppose	Delete Rule 15.5.31 or amend by changing the prohibited activity to a discretionary activity. Alternatively submitter proposes amending Rule 15.5.31 by excluding mine pit dewatering from the prohibited activity.
15.5.32	V3pLWRP-162	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Add a new condition to Rule 15.5.32 as follows: <u>7. The permit to take surface water or stream depleting groundwater is surrendered.</u>
15.5.32	V3pLWRP-255	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.32 condition 6 as follows: ...calculated in accordance with Method 1 of Schedule 10 moderated to take into account climatic data .
15.5.32	V3pLWRP-514	64095	Department of Conservation	Support	Retain Rule 15.5.32 as notified.
15.5.32	V3pLWRP-581	64075	Otaio Water User Group	Oppose	Replace Rule 15.5.32 condition (6) with condition (4) of Rule 15.5.30.
15.5.33	V3pLWRP-163	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Rule 15.5.33 to make non-compliance with condition (1) a prohibited activity and non-compliance with the other conditions a non-complying activity.
15.5.33	V3pLWRP-256	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.33 as follows: <u>non-complying prohibited activity</u>
15.5.33	V3pLWRP-515	64095	Department of Conservation	Support	Retain Rule 15.5.33 as notified.
15.5.33	V3pLWRP-582	64075	Otaio Water User Group	Support	Retain Rule 15.5.33 provided submission point V3pLWRP-581 is accepted.
15.5.34	V3pLWRP-257	64848	South Canterbury Province,	Oppose	Delete Condition 3 of Rule 15.5.34.

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			Federated Farmers of New Zealand		
15.5.34	V3pLWRP-516	64095	Department of Conservation	Support	Retain Rule 15.5.34 as notified.
15.5.34	V3pLWRP-584	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.34 by including a reference to Table 15(i).
15.5.35	V3pLWRP-258	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Rule 15.5.35. [As a consequence of amendment to Rule 15.5.34 in submission point V3pLWRP-257]
15.5.35	V3pLWRP-517	64095	Department of Conservation	Support	Retain Rule 15.5.35 as notified.
15.5.35	V3pLWRP-585	64075	Otaio Water User Group	Oppose	Seeks clarification of how a wetland (and associated values) are determined.
15.5.35	V3pLWRP-932	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Amend Rule 15.5.35 as outlined in South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-258]. [Submitter put relief sought against Policy 15.4.35 on page 15-20, which seemed to be a typographical error, as Policy 15.4.35 is on page 15-9 and is out of order of the rest of their submission]
15.5.36	V3pLWRP-259	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Rule 15.5.36 as follows: non-complying prohibited activity
15.5.36	V3pLWRP-518	64095	Department of Conservation	Support	Retain Rule 15.5.36 as notified.
15.5.36	V3pLWRP-586	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.36 by including a reference to Table 15(i).
15.5.37	V3pLWRP-164	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Replace conditions 1 and 2 of Rule 15.5.37 with a new condition as follows: <u>If the application is made before 20 December 2021 not more than 500L/s has been allocated from the 'B' allocation block;...</u>
15.5.37	V3pLWRP-260	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Insert additional conditions to Rule 15.5.37 as follows: <u>3. Abstraction can only occur when flow at the Otaio Gorge is above the relevant 'B' allocation block minimum flow limits (which must apply to all consents); and</u> <u>4. Abstraction can only occur when the depth to water in bore J39/0255 is less than 3 m below ground level.</u>
15.5.37	V3pLWRP-436	53856	Blue Cliffs Station	Oppose	Amend Rule 15.5.37 conditions 1 and 2 as follows: 1. ...'B' allocation would be allocated <u>to existing 'A' permit holders</u> in combination... 2. ...'B' allocation block would be allocated <u>would be has been allocated to users who do not hold an existing 'A' permit in combination with other granted water permits if the water permit was granted ; or</u>
15.5.37	V3pLWRP-521	64095	Department of Conservation	Support	Retain Rule 15.5.37 as notified.
15.5.37	V3pLWRP-588	64075	Otaio Water User Group	Oppose	Amend Rule 15.5.37 as follows: <ul style="list-style-type: none"> • Insert a reference to Table 11(j)); and • Add a new condition 4 as follows: <u>for all takes in relation to Table [15](i), in addition to a minimum flow of 780L/s for all users, the depth to water in bore J39/0255 is higher than 3 metres below ground level.</u>

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15.5.38	V3pLWRP-522	64095	Department of Conservation	Support	Retain Rule 15.5.38 as notified.
15.5.38	V3pLWRP-590	64075	Otaio Water User Group	Support	Retain Rule 15.5.38 as notified.
15.5.38	V3pLWRP-931	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission, however Federated Farmers did not submit on Rule 15.5.38.
15.5.39	V3pLWRP-165	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Rules 15.5.39 and 15.5.40 and replace with the following:</p> <p><u>In the South Canterbury Coastal Area, the permanent or temporary transfer of water permits shall be a discretionary activity where the following conditions are met:</u></p> <p style="padding-left: 40px;"><u>(i) The water permit has been exercised by the permit holder within the last two years; and</u></p> <p style="padding-left: 40px;"><u>(ii) The maximum amount of water transferred does not exceed the lesser of the volume of water which is reasonable for the proposed land use calculated in accordance with Schedule 10 or the volume which the permit holder has demonstrated that they have abstracted on average each year over the last two years.</u></p> <p><u>Any water permit transfer which does not comply with Rule 15.5.39 shall be a non-complying activity.</u></p>
15.5.39	V3pLWRP-262	64848	South Canterbury Province, Federated Farmers of New Zealand	Support	Retain Rule 15.5.39 as notified.
15.5.39	V3pLWRP-333	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.39 Condition 1 by adding: <u>or where there is no over-allocation.</u>
15.5.39	V3pLWRP-523	64095	Department of Conservation	Support	Retain Rule 15.5.39 as notified.
15.5.39	V3pLWRP-591	64075	Otaio Water User Group	Support	Retain Rule 15.5.39 as notified.
15.5.40	V3pLWRP-166	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Delete Rules 15.5.39 and 15.5.40 and replace with the following:</p> <p><u>In the South Canterbury Coastal Area, the permanent or temporary transfer of water permits shall be a discretionary activity where the following conditions are met:</u></p> <p style="padding-left: 40px;"><u>(i) The water permit has been exercised by the permit holder within the last two years; and</u></p> <p style="padding-left: 40px;"><u>(ii) The maximum amount of water transferred does not exceed the lesser of the volume of water which is reasonable for the proposed land use calculated in accordance with Schedule 10 or the volume which the permit holder has demonstrated that they have abstracted on average each year over the last two years.</u></p> <p><u>Any water permit transfer which does not comply with Rule 15.5.39 shall be a non-complying activity.</u></p>
15.5.40	V3pLWRP-263	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Rule 15.5.40 and rely on existing proposed LWRP rules.
15.5.40	V3pLWRP-290	63179	DairyNZ	Oppose	<p>Amend Rule 15.5.40 as follows:</p> <p>The temporary or permanent transfer, in whole or in part, (other than to the new owner of the site to which the take and use of water relates and where the location of the take and use of water does not change) of a water permit to take or use surface water or groundwater that does not meet condition 1 of rule 15.5.39 a prohibited activity <u>is a discretionary activity provided the following conditions are met:</u></p> <p><u>1. The volume of water to be transferred for annual take and use does not exceed the greater of:</u></p>

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					<p><u>(a) the annual average volume taken and used over the period 01 July 2009 – 30 June 2013 ; and</u></p> <p><u>(b) the annual average volume taken and used over the four-year period immediately preceding the application to transfer the water permit.</u></p> <p>2. In the case of a partial transfer, the total volume taken and used in all locations under the permit shall not exceed the volume described in 1 above.</p> <p>[see consequential new Rule 15.5.40A - submission point V3pLWRP-329]</p>
15.5.40	V3pLWRP-334	52267	Horticulture New Zealand	Oppose	Amend Rule 15.5.40 to a Discretionary activity.
15.5.40	V3pLWRP-437	53856	Blue Cliffs Station	Oppose	Amend Rule 15.5.40 as follows: ...and use of water relates and where the location of the take and use of water does not change) of a water permit...
15.5.40	V3pLWRP-524	64095	Department of Conservation	Support	Retain Rule 15.5.40 as notified.
15.5.40	V3pLWRP-592	64075	Otaio Water User Group	Support	Retain Rule 15.5.40 as notified.
15.5.40	V3pLWRP-993	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Rule 15.5.40 as follows:</p> <p>15.5.40 The temporary or permanent transfer, in whole or in part, (other than to the new owner of the site to which the take and use of water relates and where the location of the take and use of water does not change) of a water permit to take or use surface water or groundwater that does not meet condition 1 of rule 15.5.39 a prohibited activity is a discretionary activity provided the following conditions are met:</p> <p><u>1. The volume of water to be transferred for annual take and use does not exceed the greater of:</u></p> <p><u>(a) the annual average volume taken and used over the period 01 July 2009 – 30 June 2013 ; and</u></p> <p><u>(b) the annual average volume taken and used over the four-year period immediately preceding the application to transfer the water permit.</u></p> <p>2. In the case of a partial transfer, the total volume taken and used in all locations under the permit shall not exceed the volume described in 1 above.</p> <p>[see consequential new Rule 15.5.40A - submission point V3pLWRP-329]</p>
15.5.41	V3pLWRP-525	64095	Department of Conservation	Support	Retain Rule 15.5.41 as notified.
15.5.42	V3pLWRP-526	64095	Department of Conservation	Support	Retain Rule 15.5.42 as notified.
15.5.42	V3pLWRP-593	64075	Otaio Water User Group	Support	Retain Rule 15.5.42 as notified.
Freshwater Outcomes –Tables 15.6	V3pLWRP-24	64044	Ellis-Lea Farms (2000) Ltd	Oppose	Supports and adopts the submission of South Canterbury Province Federated Farmers on the Freshwater Outcomes and the Flow and Allocation and Water Quality Limits Tables in the variation.
Table 15(a))	V3pLWRP-336	52267	Horticulture New Zealand	Oppose	<p>Clarify whether the values in Table 15(a) are intended as targets under the NPS</p> <p>Clarify the process for updating Table 15(a) where new values are added or changed.</p>
Table 15(a))	V3pLWRP-380	53274	Central South Island Fish and Game	Oppose	<p>Amend Table 15(a) to include all relevant Freshwater Objectives such as DIN, DIP, clarity, Nitrate and other toxicants, and PH that will achieve life supporting capacity and ecosystem health.</p> <p>See Appendix 1 to submission for detail of amendments to Table 15(a).</p>
Table 15(a))	V3pLWRP-483	64075	Otaio Water User Group	Oppose	<p>Amend Table 15(a) as follows:</p> <ul style="list-style-type: none"> Replace the second row, third column heading titled 'QMCI' with: <u>QMCI [min 80% of samples in 5 year period]</u>

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					<ul style="list-style-type: none"> Replace the second row, 10th column heading titled 'Cyanobacteria mat cover (%)' with: <u>Cyanobacteria mat cover > 3mm thick [max cover of bed](%)</u>; and Specify a percentage of samples that are to meet outcomes. Delete the Cultural Indicator column or rewrite as a quantitative outcome.
Table 15(a))	V3pLWRP-554	64095	Department of Conservation	Support	Retain Table 15(a) as notified.
Table 15(a))	V3pLWRP-667	55552	Hunter Downs Development Company Limited	Oppose	Amend Table 15(a) as follows: <ul style="list-style-type: none"> Amend heading of the 'QMCI' indicator column to read: QMCI [min <u>80% of samples in 5 year period</u>] Amend the heading row in relation to 'Cyanobacteria' cover to read: Cyanobacteria mat cover <u>>3mm thick [max. cover of bed]</u> (%)
Table 15(a))	V3pLWRP-668	55552	Hunter Downs Development Company Limited	Oppose	Amend the <i>E.coli</i> numbers in Table 15(a) to relate to the current National Objective Framework Classification Band derived from the current water quality standards and modelled water quality outcomes with the implementation of Zone Committee Scenario 2 land-use changes for that waterway.
Table 15(a))	V3pLWRP-933	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(a).
Table 15(a))	V3pLWRP-981	64076	Community and Public Health	Oppose	Amend Table 15(a) to include values for cyanobacteria mat cover at 20% for rivers that are utilised for sources of human drinking water or are important recreational sites.
Table 15(b)	V3pLWRP-337	52267	Horticulture New Zealand	Oppose	Clarify whether the values in Table 15(b) are intended as targets under the NPS Clarify the process for updating Table 15(b) where new values are added or changed.
Table 15(b)	V3pLWRP-364	53274	Central South Island Fish and Game	Oppose	Amend Table 15(b) so that the <i>E.coli</i> indicator is improved beyond the NPSFM national bottom line within a set timeframe to meet at least Attribute State "B" (540/100ml) as defined in the NPSFM.
Table 15(b)	V3pLWRP-555	64095	Department of Conservation	Oppose	Amend Table 15(b) and replace the Human Health for Recreation Indicator of "1000 (wading and boating)" with " <u><260</u> " [number of <i>E.coli</i> per 100 millilitres]. Otherwise retain Table 15(b) as notified.
Table 15(b)	V3pLWRP-934	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(b).
Table 15(b)	V3pLWRP-982	64076	Community and Public Health	Oppose	Amend Table 15(b) so that the E. coli levels do not exceed the Microbial Assessment Category D value of <550 E. coli per 100ml within the current Suitability for swimming indicator update (2013) of the <u>Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas (2003)</u> , where food is gathered for consumption.
Table 15(c)	V3pLWRP-341	52267	Horticulture New Zealand	Oppose	Amend Table 15(c) to provide for interim targets for the streams in the table until the attenuation relationship between the load and the water quality outcome is established. [Submitter notes Table 15(p) in reasoning but has not requested a change to it]
Table 15(c)	V3pLWRP-382	53274	Central South Island Fish and Game	Oppose	Amend Table 15(c) so that all DIN limits are improved to 0.8 mg/l or less and include target dates. As a consequence amend Tables 15(m), (n), (o) and (p) so that the nitrogen load limits (tonnes per year) and phosphorus load limits (tonnes per year) are calculated to achieve the set concentrations for DIN and DRP in the amended Table 15(c).
Table 15(c)	V3pLWRP-559	64095	Department of Conservation	Support	Retain Table 15(c) as notified.
Table 15(c)	V3pLWRP-594	64075	Otaio Water User Group	Oppose	Amend Table 15(c) by referencing the source of data that the limits are based on. Clarify Table 15(c) by:

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					<ul style="list-style-type: none"> explaining the link between tables 15(c) limits and plan policies and objectives explaining why the approach to limit setting different from that in pLWRP and Variations <p>The submitter notes that the limits presented in Table 15(c) would be more appropriately written as targets.</p>
Table 15(c)	V3pLWRP-669	55552	Hunter Downs Development Company Limited	Oppose	Amend the DIN concentrations figures in Table 15(c) to reflect 90% toxicity. Retain 95% annual percentile.
Table 15(c)	V3pLWRP-935	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(c).
Table 15(d):	V3pLWRP-362	53274	Central South Island Fish and Game	Oppose	Amend Table 15(d) to include target dates.
Table 15(d):	V3pLWRP-562	64095	Department of Conservation	Support	Retain Table 15(d) as notified.
15(d):	V3pLWRP-670	55552	Hunter Downs Development Company Limited	Oppose	<p>Amend Table 15(d) to reflect the annual median TLI target is 6.</p> <p>Delete concentration targets for TP, TN and <i>chl a</i></p>
Table 15(d):	V3pLWRP-936	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(d).
Table 15(e):	V3pLWRP-13	64011	Oceania Dairy Limited	Oppose	Amend Table 15(e) and delete reference to "[or any sample]" for <i>E.coli</i> to remove any confusion over the target/limit.
Table 15(e):	V3pLWRP-53	64043	Roger and Lisa Small	Oppose	<p>Seeks the recalculation of loads and table 15(m) to meet the current state or better in terms of groundwater quality.</p> <p>Amend the wording for subtitle (f) to include 'assumes max caps, gmp and nitrogen flexibility caps are met'.</p>
Table 15(e):	V3pLWRP-363	53274	Central South Island Fish and Game	Oppose	Amend Table 15(e) to include target dates.
Table 15(e):	V3pLWRP-563	64095	Department of Conservation	Support	Retain Table 15(e) as notified.
Table 15(e):	V3pLWRP-595	64075	Otaio Water User Group	Oppose	Clarify if the numerical values in Table 15(e) are limits (as indicated in the table title) or alternatively targets (as indicated within the table).
Table 15(e):	V3pLWRP-937	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(e).
Table 15(e):	V3pLWRP-983	64076	Community and Public Health	Oppose	Amend Table 15(e) to include a longer term target of 5.6mg/L nitrate nitrogen annual average concentration in line with the drinking water target for 2040 or a negotiated time soon after, in relation to groundwater wells used for drinking, in Canterbury.
Table 15(f)	V3pLWRP-167	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Amend Table 15(f) column four as follows:</p> <p>Individual water supply strategies at the discretion of the consent authority</p>
Table 15(f)	V3pLWRP-596	64075	Otaio Water User Group	Support	Retain Table 15(f) as notified.
Table 15(g)	V3pLWRP-111	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Amend Table 15(g) as follows:</p> <ul style="list-style-type: none"> Increase the minimum flow at Lower Waihao (Bradshaws Bridge) to 200l/s; Introduce a partial restriction regime on all allocation blocks except those with residual flow conditions; Insert a new column headed <u>COMAR Flows to be met by 01 Jan 2030</u> and add the following minimum flows: <p><u>Sth Branch Hook (Upper [H]ook Rd Bridge) : 20l/s and winter min flow (01 May-30 Sept) of 100l/s</u></p> <p><u>Waimate (intake) : 15l/s</u></p>

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					<p><u>Merry Stream (SH1 bridge) : min flow depth of 250mm and winter min flow (01 May-30 Sept) of 300l/s</u></p> <p><u>Lower Waihao (Bradshaws Bridge) : 425l/s and a winter min flow (01 May-30 Sept) of 600l/s</u></p> <p><u>Buchanan's Creek: 200l/s</u></p> <p><u>Upper Hook: min flow 50l/s and a winter min flow (01 May-30 Sept inclusive) of 100l/s</u></p> <p><u>Lower Hook (Beach Rd): sufficient to ensure minimum flow depth of 300mm</u></p> <p><u>Waihao Arm (Poingdesters Rd): 1.5 m a.m.s.l</u></p>
Table 15(g)	V3pLWRP-313	52267	Horticulture New Zealand	Oppose	<p>Amend Table 15(g) by:</p> <ul style="list-style-type: none"> including provision for crop survival water [See submission points V3 pLWRP- 275 to 279 and 311 regarding crop survival water] and inserting a note as follows: <u>Partial restrictions do not include water consented for crop survival water for horticultural crops.</u>
15(g)	V3pLWRP-383	53274	Central South Island Fish and Game	Oppose	<p>Amend Tables 15(g) to include a new allocation framework that protects life supporting capacity and ecosystem health.</p> <p>The Ministry for Environment (2008) NES [Proposed National Environmental Standard on Ecological Flows and Water Levels (2008)] can be used as a starting point.</p> <p>For rivers and streams with mean flows less than or equal to 5 m3 /s:</p> <p>A minimum flow of 90% of the mean annual low flow (MALF) as calculated by the regional council and an allocation limit of, whichever is the greater of:</p> <ul style="list-style-type: none"> 30% of MALF as calculated by the regional council the total allocation from the catchment on the date that the national environmental standard comes into force less any resource consents surrendered, lapsed, cancelled or not replaced. <p>For rivers and streams with mean flows greater than 5 m3 /s:</p> <p>A minimum flow of 80% of MALF as calculated by the regional council and an allocation limit of, whichever is the greater of:</p> <ul style="list-style-type: none"> 50% of MALF as calculated by the regional council the total allocation from the catchment on the date that the Standard comes into force less any resource consents surrendered, lapsed, cancelled or not replaced.
Table 15(g)	V3pLWRP-447	64082	Butlers Fruit Farms Ltd	Oppose	<p>Amend Table 15(g) to include pro-rata restrictions for those within a water user group.</p> <p>[Submission point lodged against Policies 15.4.21 to 27; Rules 15.5.26 to 15.5.36; Tables 15(g), (j), (k), (l)].</p>
Table 15(g)	V3pLWRP-565	64095	Department of Conservation	Support	Retain Table 15(g) as notified.
Table 15(g)	V3pLWRP-938	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(g).
Table 15(h)	V3pLWRP-112	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Amend Table 15(h) as follows:</p> <ul style="list-style-type: none"> Amend the 'A' minimum flow on the Otaio to 96 l/s. <p>[Submitter requested this amendment to Table 15(g)].</p>

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Table 15(h)	V3pLWRP-314	52267	Horticulture New Zealand	Oppose	Amend Table 15(h) by: <ul style="list-style-type: none"> including provision for crop survival water [See submission points V3 pLWRP- 275 to 279 and 311 regarding crop survival water] and inserting a note as follows: <u>Partial restrictions do not include water consented for crop survival water for horticultural crops.</u>
Table 15(h)	V3pLWRP-384	53274	Central South Island Fish and Game	Oppose	Amend Table 15(h) to include a new allocation framework that protects life supporting capacity and ecosystem health. The Ministry for Environment (2008) NES [Proposed National Environmental Standard on Ecological Flows and Water Levels (2008)] can be used as a starting point. For rivers and streams with mean flows less than or equal to 5 m3 /s: A minimum flow of 90% of the mean annual low flow (MALF) as calculated by the regional council and an allocation limit of, whichever is the greater of: <ul style="list-style-type: none"> 30% of MALF as calculated by the regional council the total allocation from the catchment on the date that the national environmental standard comes into force less any resource consents surrendered, lapsed, cancelled or not replaced. For rivers and streams with mean flows greater than 5 m3 /s: A minimum flow of 80% of MALF as calculated by the regional council and an allocation limit of, whichever is the greater of: <ul style="list-style-type: none"> 50% of MALF as calculated by the regional council the total allocation from the catchment on the date that the Standard comes into force less any resource consents surrendered, lapsed, cancelled or not replaced.
Table 15(h)	V3pLWRP-566	64095	Department of Conservation	Support	Retain Table 15(h) as notified.
Table 15(h)	V3pLWRP-597	64075	Otaio Water User Group	Support	Retain Table 15(h) as notified.
Table 15(h)	V3pLWRP-940	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(h).
Table 15(i)	V3pLWRP-315	52267	Horticulture New Zealand	Oppose	Amend Table 15(i) by: <ul style="list-style-type: none"> including provision for crop survival water [See submission points V3 pLWRP- 275 to 279 and 311 regarding crop survival water] inserting a note as follows: <u>Partial restrictions do not include water consented for crop survival water for horticultural crops.</u>
Table 15(i)	V3pLWRP-541	64075	Otaio Water User Group	Oppose	Amend Table 15(i) as follows: <ul style="list-style-type: none"> Column with Reduce take by: replace 'pro-rata' with ' <u>stepped reduction</u>' for non-water users. Amend Table 15(i) for non-water user group consents as follows: <u>Flow at 500L/s, reduce to 50%</u> <u>Flow at 90L/s - cease take</u>
Table 15(i)	V3pLWRP-568	64095	Department of Conservation	Support	Retain Table 15(i) as notified.
Table 15(j)	V3pLWRP-316	52267	Horticulture New Zealand	Oppose	Amend Table 15(j) by: <ul style="list-style-type: none"> including provision for crop survival water [See submission points V3 pLWRP- 275 to 279 and 311 regarding crop survival water] and

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					<ul style="list-style-type: none"> inserting a note as follows: <u>Partial restrictions do not include water consented for crop survival water for horticultural crops.</u>
Table 15(j)	V3pLWRP-569	64095	Department of Conservation	Support	Retain Table 15(j) as notified.
Table 15(j)	V3pLWRP-598	64075	Otaio Water User Group	Oppose	<p>Insert a new advice note below Table 15(j) as follows:</p> <p><u>all users are to have minimum flow of 780L/s so there is no priority amongst users</u></p>
Table 15(j)	V3pLWRP-939	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(j).
Table 15(k)	V3pLWRP-161	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Table 15(k) with a numeric allocation limit for Otaio, Makikihi, Hook and Waimate Groundwater Allocation Zones.
Table 15(k)	V3pLWRP-365	53274	Central South Island Fish and Game	Oppose	Amend Table 15(k) so that the 'Sum of granted water permits at 1 May 2015' is a quantifiable number.
Table 15(k)	V3pLWRP-599	64075	Otaio Water User Group	Oppose	Amend Table 15(k) by including calculated updated sum of granted water permits.
Table 15(k)	V3pLWRP-941	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Decision sought unclear. Submitter has referenced South Canterbury Province Federated Farmers submission however, Federated Farmers did not submit on Table 15(k).
Table 15(l)	V3pLWRP-442	64082	Butlers Fruit Farms Ltd	Oppose	<p>Seeks Table 15(l) ensures there is sufficient water available for existing users to transfer [exchange] surface water for deep groundwater and provides an annual volume and rate to ensure it is financially viable.</p> <p>The submitter requests that if [sufficient] deep groundwater cannot be obtained, that minimum flow restrictions and reduction in allocation ensure existing users have the ability to go to practical and financially viable alternatives, and that users are not forced into irrigation schemes if they are unviable for the property.</p> <p>[Submission point lodged against Policies 15.4.21 to 27; Rules 15.5.26 to 15.5.36; Tables 15(g), (j), (k), (l)].</p>
Table 15(l)	V3pLWRP-600	64075	Otaio Water User Group	Support	Retain Table 15(l) as notified.
15.7.6	V3pLWRP-54	64043	Roger and Lisa Small	Oppose	Seeks recalculation of nitrogen loads for Tables 15(m), Table 15(n), Table 15(o) and Table 15(p) using more accurate methods and re-negotiation of maximum and flexibility caps.
Table 15(m)	V3pLWRP-55	64043	Roger and Lisa Small	Oppose	Seeks recalculation of nitrogen loads for Table 15(m) using more accurate methods and re-negotiation of Maximum and flexibility caps.
Table 15(m)	V3pLWRP-168	64073	Ngāi Tahu and Nga Rūnanga	Oppose	<p>Amend Table 15(m) as follows:</p> <p>Removing the provision to increase nitrogen flexibility cap limits in the Waihao-Wainono Plains as a result of augmentation. If 10kg/ha/yr is too low given the soil types, amend the flexibility cap to 15kg/ha/yr, but do not allow a higher cap as a result of augmentation.</p> <p>Remove the provision to increase the nitrogen flexibility caps from 15kg/N/ha/yr to 17kg/N/ha/yr from the 2030 in both Waihao-Wainono and Northern Streams Areas.</p>
Table 15(m)	V3pLWRP-219	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Delete Tables 15(m) - 15(p), or amend as follows:</p> <ol style="list-style-type: none"> Replace maximum cap numbers in Table 15(n) with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. Amend Variation 3 to enable N loads (Table 15(o) and 15(p)), flexibility caps (Table 15(m)) and maximum caps (Table 15(n)) to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the NARG recommendations and the ZIP Addendum. Amend Tables 15(m) - 15(p) when modelling errors are corrected, and when S-maps are updated.
Table 15(m)	V3pLWRP-339	63179	DairyNZ	Oppose	<p>Delete Table 15(m) and include relevant limits in Rule 15.5.2 [see submission point V3pLWRP-269]</p> <p>Submitter also requests that as the MGM process is due to release its output in September 2015 that decisions on numbers in Tables 15(m), (n)</p>

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					and (o) (and flexibility caps) be deferred (if necessary) to ensure they are based on best available information [see submission point V3pLWRP-399].
Table 15(m)	V3pLWRP-346	52267	Horticulture New Zealand	Oppose	Amend Table 15(m) by including a note as follows: <u>This table will be updated when a new version of OVERSEER® is released.</u>
Table 15(m)	V3pLWRP-387	53274	Central South Island Fish and Game	Oppose	Delete Table 15(m).
Table 15(m)	V3pLWRP-420	64072	David Linton	Oppose	Amend Table 15(m) to provide for: <ul style="list-style-type: none"> low level development of existing dryland and partly irrigated properties realisation of existing consents more allocation to dryland properties over time and increase the number of years in the calculation of the nitrogen baseline.
Table 15(m)	V3pLWRP-571	64095	Department of Conservation	Support	Retain Table 15(m) as notified.
Table 15(m)	V3pLWRP-601	64075	Otaio Water User Group	Oppose	Amend Table 15(m) by: <ul style="list-style-type: none"> Specifying the OVERSEER® version used to determine the Nitrogen caps in the variation Accommodating the changing OVERSEER® versions through a schedule or by some other effective means by a group established for this role and in agreement with ECan Given the concerns with OVERSEER®, potentially MGM with Flexibility caps be used instead. Seeks this is resolved and agreed to prior to a hearing.
Table 15(m)	V3pLWRP-671	55552	Hunter Downs Development Company Limited	Oppose	Amend Table 15(m) by having a footnote as follows: <u>[x] If OVERSEER® is updated, the most recent version shall be used to recalculate the nitrogen loss limit in [Table X] using the same input data (at which point the new loss limit will apply).</u> [Alternative solution to submission point V3pLWRP-644]
Table 15(m)	V3pLWRP-685	61382	NZ Pork Industry Board	Oppose	Amend Table 15(m) to clearly define what it refers to, for example " <u>Estimated Nitrogen Loss Below the Root Zone Flexibility Cap Limits</u> "
Table 15(m)	V3pLWRP-738	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-750	64067	Keith and Christine Adams	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-764	64135	Goldwyn Angus Limited	Oppose	Amend Table 15(m) by leaving blank or defer decision on plan change and adoption of tables until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-794	64121	David Sleigh	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of tables until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-806	64120	Guy Wigley	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-815	64125	Beef and Lamb New Zealand Ltd	Oppose	Amend Table 15(m) to incorporate decisions sought in this submission. Leave Table 15(m) blank to incorporate updated data when available and to provide for greater flexibility for low N loss activities.
Table 15(m)	V3pLWRP-825	64043	Roger and Lisa Small	Oppose	Seeks the recalculation of loads to meet the current state or better in terms of groundwater quality. [Sought amendment to Table 15(m) - new decision point created]
Table 15(m)	V3pLWRP-828	64042	John Gardner	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.

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Table 15(m)	V3pLWRP-839	64080	Daniel Studholme	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of tables until catchment models have been updated to include new version of OVERSEER® , Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-849	64099	David Gardner	Oppose	Amend Table 15(m) by leaving them blank or defer decision on plan change and adoption of tables until catchment models have been updated to include new version of OVERSEER® , Matrix of Good Management and updated soils data.
Table 15(m)	V3pLWRP-879	64013	Graham Patterson	Oppose	Amend Table 15(m) to standardise the playing field for [flexibility] cap values - as per Otago Plan.
Table 15(m)	V3pLWRP-907	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Submitter seeks that Council reassess the numbers in Table 15(n) [flexibility caps] to ensure they actually allow for some flexibility, particularly in the Hill Areas.</p> <p>Submitter seeks clarification for how the flexibility cap is set at 5 kgN/ha/yr for Hill Areas and the justification for the limit of 10 kgN/ha/yr in the Wainono Plains Area or the 15 kgN/ha/yr in the Northern Streams Plains Area.</p> <p>Add a footnote to the tables that states: <u>“the methods used to generate the target loads should be reapplied when there is a new release of OVERSEER® to ensure that the derived target load and consequent nutrient discharge allowance are compatible with the farm-scale nutrient budgets that land managers might be required to produce for compliance purposes.”</u></p>
Table 15(m)	V3pLWRP-943	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Seeks that Table 11(m) be recalculated with the latest version of OVERSEER® .
Table 15(m)	V3pLWRP-956	56725	Fertiliser Association of New Zealand	Support	<p>Retain Table 15(m)</p> <p>[submitter seeks the opportunity to amend table values through a plan change]</p>
Table 15(m)	V3pLWRP-995	64090	Fonterra Co-operative Group Limited	Oppose	<p>Delete Table 15(m).</p> <p>[submitter considers that the relevant limits should be included in Rule 15.5.2 itself, see submission point V3pLWRP-988]</p>
Table 15(n)	V3pLWRP-32	64043	Roger and Lisa Small	Oppose	<p>Seeks re-negotiation of maximum caps.</p> <p>[Sought amendment to Policy 15.4.6, but decision sought referred to maximum cap]</p>
Table 15(n)	V3pLWRP-56	64043	Roger and Lisa Small	Oppose	Seeks recalculation of nitrogen loads for Table 15(n) using more accurate methods and re-negotiation of Maximum and flexibility caps.
Table 15(n)	V3pLWRP-217	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Delete Tables 15(m) - 15(p), or amend as follows:</p> <ol style="list-style-type: none"> 1. Replace maximum cap numbers in Table 15(n) with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. 2. Amend Variation 3 to enable N loads (Table 15(o) and 15(p)), flexibility caps (Table 15(m)) and maximum caps (Table 15(n)) to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the NARG recommendations and the ZIP Addendum. 3. Amend Tables 15(m) - 15(p) when modelling errors are corrected, and when S-maps are updated.
Table 15(n)	V3pLWRP-347	52267	Horticulture New Zealand	Oppose	<p>Amend Table 15(n) by including a note as follows:</p> <p><u>This table will be updated when a new version of OVERSEER® is released;</u> and</p> <p>Amend the headings as follows:</p> <p>Delete "farming enterprises and nutrient user groups" from column 4 and include in column 3 with "Existing Farming activities".</p>
Table 15(n)	V3pLWRP-351	63179	DairyNZ	Oppose	<p>Amend Table 15(n). See full submission for detail of decision requested. In summary the submitter seeks:</p> <ul style="list-style-type: none"> • maximum caps are adjusted following re-running the models to determine the existing and required catchment load - submitter refers to Dairy NZ modelling and concerns that the maximum nitrogen loss rates in Table 15(n) will have an unintended and perverse effect • base initial maximum nitrogen leaching rates on the MGM [Matrix of Good Management]

Plan Provision	Point ID	Sub ID	Submitter Name	Support/ Oppose	Planner - Summary of Decision Requested
					<ul style="list-style-type: none"> maximum [nitrogen loss] rates to be set at levels that deliver the outcomes agreed by the NARG and recorded in Appendix 22 of the Process Overview Report R15/29 (Norton and Robson, 2015) that would allow land use intensity of up to 5 cows/ha at GMP on poorly drained and poorly drained light soils amend Table 11(n) by deleting column 1 headed "soil type as shown on Planning Map" and replacing with a new column " <u>Soil type (S-Map references)</u> " to directly refer to soil types on S-Maps and as applied to OVERSEER® modelling [specified in relief sought] amend Table 11(n) column 2 by replacing the term "maximum cap" with " <u>maximum nitrogen loss rate</u> " amend Table 11(n) column 3 by deleting heading "existing farming activities". <p>Submitter also requests that as the MGM process is due to release its output in September 2015 that decisions on numbers in Tables 15(m), (n) and (o) (and flexibility caps) be deferred (if necessary) to ensure they are based on best available information [see submission point V3pLWRP-399].</p>
Table 15(n)	V3pLWRP-388	53274	Central South Island Fish and Game	Oppose	Submitter seeks assurance that the kg/N/ha/yr N limits will achieve the freshwater objectives.
Table 15(n)	V3pLWRP-572	64095	Department of Conservation	Support	Retain Table 15(n) as notified.
Table 15(n)	V3pLWRP-602	64075	Otaio Water User Group	Oppose	<p>Amend Table 15(n) by:</p> <ul style="list-style-type: none"> Specifying the OVERSEER® version used to determine the Nitrogen caps in the variation Accommodating the changing OVERSEER® versions through a schedule or by some other effective means by a group established for this role and in agreement with ECan Given the concerns with OVERSEER®, potentially MGM with Flexibility caps be used instead. <p>Seeks this is resolved and agreed to prior to a hearing.</p>
Table 15(n)	V3pLWRP-672	55552	Hunter Downs Development Company Limited	Oppose	<p>Amend Table 15(n) by having a footnote as follows:</p> <p><u>[x] If OVERSEER® is updated, the most recent version shall be used to recalculate the nitrogen loss limit in [Table X] using the same input data (at which point the new loss limit will apply).</u></p> <p>[Alternative solution to submission point V3pLWRP-644]</p>
Table 15(n)	V3pLWRP-686	61382	NZ Pork Industry Board	Oppose	Amend Table 15(n) to clearly define what it refers to, for example " <u>Estimated Nitrogen Loss Below the Root Zone Flexibility Cap Limits</u> "
Table 15(n)	V3pLWRP-705	56725	Fertiliser Association of New Zealand	Oppose	<p>Amend Table 15(n) to provide an exemption for existing activities on extremely light soils to meet the maximum cap by 2030, and provide for this to be met over the longer term.</p> <p>[Reference made to Policies 15.4.5 and 15.4.6]</p>
Table 15(n)	V3pLWRP-739	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Amend Table 15(n) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(n)	V3pLWRP-751	64067	Keith and Christine Adams	Oppose	Amend Table 15(n) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(n)	V3pLWRP-765	64135	Goldwyn Angus Limited	Oppose	Amend Table 15(n) by leaving blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(n)	V3pLWRP-807	64120	Guy Wigley	Oppose	Amend Table 15(n) by leaving them blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(n)	V3pLWRP-880	64013	Graham Patterson	Oppose	Amend Table 15(n) to standardise the playing field for [maximum] cap values - as per Otago Plan.
Table 15(n)	V3pLWRP-917	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Submitter seeks that Council delete the maximum cap numbers Table 15(n) and retain the table as a place setter for MGM [Matrix of Good Management] numbers when available.</p> <p>Add a footnote to the tables that states: <u>“the methods used to generate the target loads should be reapplied when there is a new release of OVERSEER® to ensure that the derived target load and consequent nutrient discharge allowance are compatible with the farm-scale nutrient budgets that land managers might be required to produce for compliance purposes.”</u></p>

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Table 15(n)	V3pLWRP-944	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Seeks that Table 11(n) be recalculated with the latest version of OVERSEER® .
Table 15(n)	V3pLWRP-957	56725	Fertiliser Association of New Zealand	Support	Amend Table 15(n) to give effect to Policies 15.4.5 and 15.4.6 in relation to farming activities of extremely light soils to meet the maximum cap in the longer term (beyond 2030).
Table 15(n)	V3pLWRP-996	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Table 15(n) in summary the submitter seeks:</p> <ul style="list-style-type: none"> • maximum caps are adjusted following re-running the models to determine the existing and required catchment load - submitter refers to Dairy NZ modelling and concerns that the maximum nitrogen loss rates in Table 15(n) will have an unintended and perverse effect • base initial maximum nitrogen leaching rates on the MGM [Matrix of Good Management] • maximum [nitrogen loss] rates to be set at levels that deliver the outcomes agreed by the NARG and recorded in Appendix 22 of the Process Overview Report R15/29 (Norton and Robson, 2015) that would allow land use intensity of up to 5 cows/ha at GMP on poorly drained and poorly drained light soils • amend Table 11(n) by deleting column 1 headed "soil type as shown on Planning Map" and replacing with a new column " <u>Soil type (S-Map references)</u> " to directly refer to soil types on S-Maps and as applied to OVERSEER® modelling [specified in relief sought] • amend Table 11(n) column 2 by replacing the term "maximum cap" with " <u>maximum nitrogen loss rate</u> " • amend Table 11(n) column 3 by deleting heading "existing farming activities". <p>Submitter also requests that as the MGM process is due to release its output in September 2015 that decisions on numbers in Tables 15(n) and (o) (and flexibility caps) be deferred (if necessary) to ensure they are based on best available information.</p>
Table 15(o)	V3pLWRP-14	64011	Oceania Dairy Limited	Oppose	Amend Table 15(o) to include an industrial allocation for Oceania Dairy Limited in the Morven-Sinclairs area [similar to the Waihao-Wainono Area] where Oceania Dairy Limited currently has a consent for disposal of wastewater on land.
Table 15(o)	V3pLWRP-57	64043	Roger and Lisa Small	Oppose	Seeks recalculation of nitrogen loads for Table 15(o) using more accurate methods and re-negotiation of Maximum and flexibility caps.
Table 15(o)	V3pLWRP-169	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend Table 15(o) by including a maximum nitrogen catchment load for Morven-Sinclairs Area.
Table 15(o)	V3pLWRP-220	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	<p>Delete Tables 15(m) - 15(p), or amend as follows:</p> <ol style="list-style-type: none"> 1. Replace maximum cap numbers in Table 15(n) with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. 2. Amend Variation 3 to enable N loads (Table 15(o) and 15(p)), flexibility caps (Table 15(m)) and maximum caps (Table 15(n)) to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the NARG recommendations and the ZIP Addendum. 3. Amend Tables 15(m) - 15(p) when modelling errors are corrected, and when S-maps are updated.
Table 15(o)	V3pLWRP-381	63179	DairyNZ	Oppose	<p>Amend Table 15(o). Revisit the catchment modelling and recalculate the catchment loads using the latest version of OVERSEER® (6.2) and MGM to generate more reliable estimates of the existing load.</p> <p>Submitter also requests that as the MGM process is due to release its output in September 2015 that decisions on numbers in Tables 15(m), (n) and (o) (and flexibility caps) be deferred (if necessary) to ensure they are based on best available information [see submission point V3pLWRP-399].</p>
Table 15(o)	V3pLWRP-574	64095	Department of Conservation	Support	Retain Table 15(o) as notified.
Table 15(o)	V3pLWRP-603	64075	Otaio Water User Group	Oppose	<p>Amend Table 15(o) by:</p> <ul style="list-style-type: none"> • Specifying the OVERSEER® version used to determine the Nitrogen caps in the variation • Accommodating the changing OVERSEER® versions through a schedule or by some other effective means by a group established for this role and in agreement with ECan • Given the concerns with OVERSEER®, potentially MGM with Flexibility caps be used instead. <p>Seeks this is resolved and agreed to prior to a hearing.</p>

Plan Provision	Point ID	Sub ID	Submitter Name	Support/ Oppose	Planner - Summary of Decision Requested
Table 15(o)	V3pLWRP-673	55552	Hunter Downs Development Company Limited	Oppose	Amend Table 15(o) by having a footnote as follows: <u>[x] If OVERSEER® is updated, the most recent version shall be used to recalculate the nitrogen loss limit in [Table X] using the same input data (at which point the new loss limit will apply).</u> [Alternative solution to submission point V3pLWRP-644]
Table 15(o)	V3pLWRP-691	63247	Ballance Agri-Nutrients Limited	Oppose	Amend the fourth row of Table 15(o) as follows (or similar): "0, <u>unless:</u> <u>i. the nitrogen load limits set out in Table 15(p) are not exceeded, in which case the discharge shall not, in combination with all others in the Morven-Sinclairs Area, exceed the nitrogen load limit set out in Table 15(p); or</u> <u>ii. the proposed use has adopted the best practicable option."</u>
Table 15(o)	V3pLWRP-942	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Submitter has referenced South Canterbury Province Federated Farmers submission [see submission point V3pLWRP-220].
Table 15(o)	V3pLWRP-997	64090	Fonterra Co-operative Group Limited	Oppose	Amend Table 15(o). Revisit the catchment modelling and recalculate the catchment loads using the latest version of OVERSEER® (6.2) and MGM to generate more reliable estimates of the existing load. Submitter also requests that as the MGM process is due to release its output in September 2015 that decisions on numbers in Tables 15(n) and (o) (and flexibility caps) be deferred (if necessary) to ensure they are based on best available information. Seeks a specific nitrogen load limit in Table 15(o) [as a consequential amendment to submission V3pLWRP-1006] for industrial or trade process wastewater systems sufficient to provide for the sewage discharge from the Studholme site; or a combined nitrogen load limit in Table 15(o) to include waste water and sewage from the industrial or trade process wastewater system.
Table 15(o)	V3pLWRP-1010	64090	Fonterra Co-operative Group Limited	Support	Retain the 40 tonne N/yr load limit for milk processing wastewater in the Waihao-Wainono Area and identify it as relating to the Studholme processing site: 40 (<u>Studholme</u> milk processing wastewater) 2 (Waimate community sewage) Amend table 15(o) [if the relief for Rule 15.5.15 and Rule 15.5.16 is not accepted - consequential amendment] to provide a specific load for the discharge of sewage associated with any Studholme 'industrial or trade process wastewater system' (or a small increase in the 40 t/yr load to cover such discharges, on the basis they are included with "Studholme milk processing waste water").
Table 15(p)	V3pLWRP-15	64011	Oceania Dairy Limited	Oppose	Amend Table 15(p) and revise the nitrogen load limit for Morven Sinclairs using "actual" rather than "Good management practice (GMP)" modelled nitrogen losses to better reflect the current catchment nitrogen load.
Table 15(p)	V3pLWRP-58	64043	Roger and Lisa Small	Oppose	Seeks recalculation of nitrogen loads for Table 15(p) using more accurate methods and re-negotiation of Maximum and flexibility caps.
Table 15(p)	V3pLWRP-221	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Delete Tables 15(m) - 15(p), or amend as follows: 1. Replace maximum cap numbers in Table 15(n) with relevant good management practice benchmark N loss numbers from the Matrix of Good Management project. 2. Amend Variation 3 to enable N loads (Table 15(o) and 15(p)), flexibility caps (Table 15(m)) and maximum caps (Table 15(n)) to be adjusted to match new versions of OVERSEER® i.e. to retain their purpose, consistent with the intentions of the NARG recommendations and the ZIP Addendum. 3. Amend Tables 15(m) - 15(p) when modelling errors are corrected, and when S-maps are updated.
Table 15(p)	V3pLWRP-348	52267	Horticulture New Zealand	Oppose	Amend Table 15(p) by including a note as follows:

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					<u>This table will be updated when a new version of OVERSEER® is released.</u>
Table 15(p)	V3pLWRP-366	53274	Central South Island Fish and Game	Oppose	Amend Table 15(p) to include amended and lower Nitrogen load limits (tonnes per year) from 2030. Submitter seeks assurance that the N load limits will meet the NPSFW and achieve life supporting capacity and ecosystem health. If the loads do not meet the objectives, then they must be reduced.
Table 15(p)	V3pLWRP-395	53683	Dairy Holdings Limited	Oppose	Amend Table 15(p) Morven-Sinclairs row by inserting into the Load limit (t/yr) column the following two bullet points: <ul style="list-style-type: none"> • <u>Morven Glenavy Irrigation Scheme - combined total nitrogen baseline of properties within the Scheme.</u> • <u>Individual Properties - nitrogen baseline</u> [No decision sought was provided regarding the note below the table referenced in the Submission or if the words 'Morven -Sinclairs Hill Area 0' was to stay or not]
Table 15(p)	V3pLWRP-576	64095	Department of Conservation	Support	Retain Table 15(p) as notified.
Table 15(p)	V3pLWRP-604	64075	Otaio Water User Group	Oppose	Amend Table 15(p) by: <ul style="list-style-type: none"> • Specifying the OVERSEER® version used to determine the Nitrogen caps in the variation • Accommodating the changing OVERSEER® versions through a schedule or by some other effective means by a group established for this role and in agreement with ECan • Given the concerns with OVERSEER®, potentially MGM with Flexibility caps be used instead. Seeks this is resolved and agreed to prior to a hearing.
Table 15(p)	V3pLWRP-674	55552	Hunter Downs Development Company Limited	Oppose	Amend Table 15(p) by having a footnote as follows: <p><u>[x] If OVERSEER® is updated, the most recent version shall be used to recalculate the nitrogen loss limit in [Table X] using the same input data (at which point the new loss limit will apply).</u> [Alternative solution to submission point V3pLWRP-644]</p> <p>And</p> <p>Delete the footnote (*) underneath Table 15(p) relating to Irrigation Scheme [nitrogen] load.</p>
Table 15(p)	V3pLWRP-740	64087	Nutrient Allocation Reference Group Low Emitters Group	Oppose	Amend Table 15(p) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(p)	V3pLWRP-752	64067	Keith and Christine Adams	Oppose	Amend Table 15(p) by leaving them blank or defer decision on plan change and adoption of the table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(p)	V3pLWRP-766	64135	Goldwyn Angus Limited	Oppose	Amend Table 15(p) by leaving blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(p)	V3pLWRP-808	64120	Guy Wigley	Oppose	Amend Table 15(p) by leaving them blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of OVERSEER®, Matrix of Good Management and updated soils data.
Table 15(p)	V3pLWRP-893	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Submitter seeks clarification of the meaning and legality of the note (asterisk) beneath Table 15(p) which describes the requirements for accessing the irrigation scheme nitrogen load - scheme members are not permitted to increase above the property nitrogen baseline up to the flexibility cap before accessing the scheme load.
Table 15(p)	V3pLWRP-918	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	Amend Table 15(p) by deleting the catchments/stream that need to achieve a zero or 1 T N/yr load limit as [exceeding] this will trigger prohibited activity status [under the rules]. Provide clarity regarding how Council will monitor the nitrogen load in each of the areas/catchments, and specify how the load limit will be measured, frequency, from where, and how results will be notified to ensure that farms in catchment know what the load status is. Add a footnote to the tables that states: <u>“the methods used to generate the target loads should be reapplied when there is a new release of OVERSEER® to ensure that the derived target load and consequent nutrient discharge allowance are compatible with the farm-scale nutrient budgets that land managers might be required to produce for compliance purposes.”</u>

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Table 15(p)	V3pLWRP-945	64084	Willans Holdings / Coastal Farms Ltd	Oppose	Seeks that Table 11(p) be recalculated with the latest version of OVERSEER® .
Table 15(p)	V3pLWRP-958	56725	Fertiliser Association of New Zealand	Oppose	Amend Table15(p) to: a) provide clarity of the intention and application of the load limits and how they relate to baseline limits, flexibility cap limits and maximum cap limits being applied to meet catchment loads; and b) amend the zero and 1 t/yr limits. OR Delete Table 15(p) and make any consequential amendments to Variation 3.
Flow Sensitive Catchments 15.8	V3pLWRP-438	53856	Blue Cliffs Station	Oppose	Amend Section 15.8 by deleting reference to St Andrews Stream
Flow Sensitive Catchments 15.8	V3pLWRP-577	64095	Department of Conservation	Support	Retain the Flow Sensitive Catchment Table as notified.
Flow Sensitive Catchments 15.8	V3pLWRP-605	64075	Otaio Water User Group	Oppose	Clarify in Section 15.8 the location of the St Andrews catchment. If unable to clarify, delete this sub catchment from Section 15.8.
High Naturalness Water Bodies 15.9	V3pLWRP-390	53274	Central South Island Fish and Game	Oppose	Amend Table by inserting under the column 'Outstanding and Significant Characteristics' for the Hook River: <ul style="list-style-type: none"> Ecological habitat of high value
High Naturalness Water Bodies 15.9	V3pLWRP-580	64095	Department of Conservation	Oppose	Amend the list of High Naturalness Water Bodies in section 15.9. Insert the following two areas of significant conservation value (ASCV) as described in the operative ECan Coastal Environment Plan: <ul style="list-style-type: none"> Wainono-Waihao River Mouth (12-028) Waitaki River Mouth (12-029)
High Naturalness Water Bodies 15.9	V3pLWRP-606	64075	Otaio Water User Group	Support	Retain Section 15.9 as notified
Amendments to Section 16 - Schedules	V3pLWRP-170	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Add a new section to Part B of Schedule 7 which reads: <u>7. Waihao-Wainono Cultural Landscape Areas</u> <u>a. A description of the land within or adjoining the Cultural Landscape Area shown on the Planning Maps in Section 15.</u> <u>b. A description of any discharges on to land or into water in the Cultural Landscape Area which may result from the property, including: livestock, discharge from an effluent pond or the spreading of effluent, septic tanks, offal pits or silage pits, or irrigation water, use of hazardous substances.</u> <u>c. Any mitigation measures proposed to minimise the risk of a discharge of contaminants directly or indirectly into water within the Cultural Landscape Area.</u> <u>d. Any actions to maintain or enhance indigenous vegetation or mahinga kai.</u> <u>e. Any consultation undertaken with Te Rūnanga o Waihao or Te Rūnanga o Arowhenua and the results of that consultation.</u>
Amendments to Section 16- Schedules	V3pLWRP-278	52267	Horticulture New Zealand	Oppose	Amend Schedule 10 Reasonable Use Test Method 1 as follows: <u>Within the South Coastal Canterbury Area method 1 shall determine seasonal irrigation demand for horticultural crops for crop survival water as 10 years out of 10.</u>
Amendments to Section 16- Schedules	V3pLWRP-587	64095	Department of Conservation	Oppose	Insert new schedule X. Table X: Schedule of known Canterbury mudfish (<i>Neochanna burrowsius</i>) habitats in the South Coastal Canterbury sub-regional area. [See full submission for new schedule X. Relates to submission point V3pLWRP-544]

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Schedule 24b- Farm Practices	V3pLWRP-16	64011	Oceania Dairy Limited	Oppose	Amend Schedule 24b - Farm Practices to reference "current" or "most recent" [OVERSEER®] Best Practice Data Input Standards.
Schedule 24b- Farm Practices	V3pLWRP-25	64044	Ellis-Lea Farms (2000) Ltd	Oppose	Supports and adopts the submission of South Canterbury Province Federated Farmers on Schedule 24b - Farm Practices.
Schedule 24b- Farm Practices	V3pLWRP-264	64848	South Canterbury Province, Federated Farmers of New Zealand	Oppose	Amend Schedule 24b (e)(ii) as follows: 'Land Application' in the Dairy NZ Farm Dairy Effluent Design Standard [2013]. and replace with the following: <u>A farmers guide to managing farm dairy effluent - a good practice guide for land application systems.</u>
Schedule 24b- Farm Practices	V3pLWRP-352	52267	Horticulture New Zealand	Oppose	Clarify that Schedule 24b relates specifically to South Coastal Canterbury. Amend Schedule 24b - Farm Practices (d) Cultivation (ii) as follows: ...minimum of 3 metre uncultivated vegetative strip <u>or other appropriate sediment control measures such as benched headlands, interception drains, bunds, grassed swales, contour drains or sediment ponds .</u> A note could be added to refer to the <u>Horticultural NZ Erosion and Sediment Control Guidelines Vegetable Production June 2014.</u> [See submission for link to the document referred to above].
Schedule 24b- Farm Practices	V3pLWRP-396	63179	DairyNZ	Oppose	Amend Schedule 24(b) by deleting item (e) from Schedule 24b and replace with the following: e) Collected Animal Effluent: (i) Collection, storage and treatment systems for dairy effluent installed or replaced after after 1 October 2014 meet the Dairy NZ Farm Dairy Effluent Design Standard and Code of Practice [2013]. (ii) The application, separation distances, depth, uniformity and intensity of dairy effluent disposal is checked annually in accordance with Section 4 'Land Application' in the Dairy NZ Farm Dairy Effluent Design Standard [2013]. <u>The animal effluent disposal system application separation distances, depth, uniformity and intensity are self-checked annually in accordance with Section 4 'Land Application' in the guideline "A Farmers Guide to Managing Farm Dairy Effluent – A Good Practice Guide for Land Application Systems" [2013].</u> (iii) Records of the application, separation distances, depth, uniformity and intensity of dairy effluent disposal, in accordance with (e)(ii), are kept and provided to the Canterbury Regional Council upon request. [e)(i) includes the date '...1 October 2014...' which is different to the date in the notified Variation 3 which is '...1 May 2015...', but the submitter does not highlight this as a change they are seeking in their submission]
Schedule 24b- Farm Practices	V3pLWRP-607	64075	Otaio Water User Group	Support	Retain Schedule 24b definitions as notified.
Schedule 24b- Farm Practices	V3pLWRP-687	61382	NZ Pork Industry Board	Support	Retain the non-retrospective requirement in Schedule 24b(e) [Collected Animal Effluent] for effluent systems to meet the required standard.
Schedule 24b- Farm Practices	V3pLWRP-696	63247	Ballance Agri-Nutrients Limited	Oppose	Amend Schedule 24a(a)(i) as follows (or similar): "A nutrient budget based on soil nutrient tests has been prepared, using OVERSEER® in accordance with the OVERSEER® Best Practice Data Input Standard [2013], or an equivalent model approved by the Chief Executive of Canterbury Regional Council and <u>shall only need to be</u> is reviewed annually where :- <u>(a) The use of land for a farming activity results in a material change defined as an increase in modelled nitrogen or phosphorus losses over a property which exceed 10% over the previous year's nutrient budget;</u> <u>(b) Where the use of land for a farming activity results in a material change as set out in clause (a)(i)(a) above, the nutrient budget shall be</u>

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					<p><u>updated using OVERSEER® or an approved equivalent model in accordance with clause (a)(i);</u></p> <p><u>(c) In the event that the use of land for a farming activity does not result in a material change as set out in clause (a)(i)(a) above, then the nutrient budget shall remain in place for a period of three years, and only require an annual review of input data to confirm the integrity of this information;</u></p> <p><u>(d) Following the three year period set out in (c)(i)(a) above, the nutrient budget shall be formally reviewed in accordance with clause (a)(i);</u></p> <p><u>(e) All updating of nutrient budgets should be conducted by an appropriately qualified and experienced person."</u></p>
Schedule 24b- Farm Practices	V3pLWRP-919	56708	Ravensdown Fertiliser Co-operative Limited	Oppose	<p>Amend Schedule 24b – Farm Practices as follows:</p> <p>“(a) Nutrient Management:</p> <p>(i) A nutrient budget based on soil nutrient tests has been prepared, using OVERSEER® in accordance with the <u>latest version of the OVERSEER® Best Practice Data Input Standards [2013]</u> , or an equivalent model approved by the Chief Executive of Canterbury Regional Council , and is reviewed annually .</p> <p><u>(ia) Where a material change in the land use associated with the farming activity occurs (being a change exceeding that resulting from normal crop rotations or variations in climatic or market conditions) the nutrient budget shall be prepared at the end of the year in which the change occurs, and also three years after the change occurs;</u></p> <p><u>(ib) Where a material change in the land use associated with the farming activity does not occur, the nutrient budget shall be prepared once every three years;</u></p> <p><u>(ic) An annual review of the input data used to prepare the nutrient budget shall be carried out by or on behalf of the landowner for the purposes of ensuring the nutrient budget accurately reflects the farming system. A record of the review shall be kept by the landowner.</u></p> <p>(ii) Fertiliser is applied in accordance with the Code of Practice for Nutrient Management</p> <p>[2007].</p> <p>(iii) Records of soil tests, nutrient budgets and fertiliser applications are kept and provided to the Canterbury Regional Council upon request.”</p> <p>[Submitter states that they have raised concerns about requiring a nutrient budget to be prepared and reviewed annually as part of the hearing processes for Variation 1 and Variation 2 and that they support the wording proposed in the Variation 2 s.42A Report]</p>
Schedule 24b- Farm Practices	V3pLWRP-959	56725	Fertiliser Association of New Zealand	Oppose	<p>Replace Schedule 24b (a)(i) with the same wording as Schedule 24(a) in the recommended version of the PCLWRP Variation 1, adopted by Council 23 April 2015 which says:</p> <p>Nutrient Management:</p> <p>(i) A nutrient budget based on soil tests has been prepared, using OVERSEER® ® in accordance with the <u>latest version of the OVERSEER® ® Best Practice Data Input Standards, or an equivalent model approved by the Chief Executive of Environment Canterbury</u></p> <p><u>(ia) Where a material change in the land use associated with the farming activity occurs (being a change exceeding that resulting from normal crop rotations or variations in climatic or market conditions) the nutrient budget shall be prepared at the end of the year in which the change occurs, and also three years after the change occurs;</u></p> <p><u>(ib) Where a material change in the land use associated with the farming activity does not occur, the nutrient budget shall be prepared once every three years;</u></p> <p><u>(ic) An annual review of the input data used to prepare the nutrient budget shall be carried out by or on behalf of the landowner for the purposes of ensuring the nutrient budget accurately reflects the farming system. A record of the review shall be kept by the landowner.</u></p> <p>Amend Schedule 24b (a)(ii) as follows:</p>

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					"Code of Practice for Nutrient Management (2007 2013)"
Schedule 24b- Farm Practices	V3pLWRP-998	64090	Fonterra Co-operative Group Limited	Oppose	<p>Amend Schedule 24(b) by deleting item (e) from Schedule 24b and replace with the following:</p> <p>e) Collected Animal Effluent:</p> <p>(i) Collection, storage and treatment systems for dairy effluent installed or replaced after after 1 October 2014 meet the Dairy NZ Farm Dairy Effluent Design Standard and Code of Practice [2013].</p> <p>(ii) The application, separation distances, depth, uniformity and intensity of dairy effluent disposal is checked annually in accordance with Section 4 ‘Land Application’ in the Dairy NZ Farm Dairy Effluent Design Standard [2013]. <u>The animal effluent disposal system application separation distances, depth, uniformity and intensity are self-checked annually in accordance with Section 4 ‘Land Application’ in the guideline “A Farmers Guide to Managing Farm Dairy Effluent – A Good Practice Guide for Land Application Systems” [2013].</u></p> <p>(iii) Records of the application, separation distances, depth, uniformity and intensity of dairy effluent disposal, in accordance with (e)(ii), are kept and provided to the Canterbury Regional Council upon request.</p> <p>[e)(i) includes the date '...1 October 2014...' which is different to the date in the notified Variation 3 which is '...1 May 2015...', but the submitter does not highlight this as a change they are seeking in their submission]</p>
South Coastal Canterbury Area Maps	V3pLWRP-124	64073	Ngāi Tahu and Nga Rūnanga	Oppose	Amend the planning maps to identify a cultural landscape area that follows 100 metres inland from the highest level of Wainono lagoon, 10020 metres each side of the banks of the Waihao River and the Dead Arm, and 20 metres inland of the Fenton Reserves and the Waituna [S]Ateam and Hook River east of SH 1 where form part of the mātaítai.
South Coastal Canterbury Area Maps	V3pLWRP-583	64095	Department of Conservation	Support	Retain Index and Planning Maps as notified.

