



Summary of Submissions and Decisions Requested

Proposed Plan Change 2

18 November 2019

Introduction

This document is a summary of the decisions or changes requested in each submission received on the Proposed Plan Change 2 (PPC2) to the Manawatū-Whanganui Regional Council (Horizons) One Plan. In this document, the submissions are listed in the order they were received (by submitter number and then submission point number).

The purpose of this summary is to provide you with an overview of the decisions sought by submitters on PPC2, making it easier to identify whether you would like to make a further submission (if you are eligible to do so).

We strongly advise you to read the whole submission if you are considering making a further submission. All submissions are available on Horizons' website (<http://www.horizons.govt.nz/publications-feedback/one-plan-reviews-changes/plan-change-2/plan-change-2-submissions>)

Further submissions

Further submissions are an opportunity to support or oppose decisions sought by submitters, and give your reasons. The further submission process is prescribed by the Resource Management Act 1991 (RMA)¹. It enables the following people to make a further submission:

- Any person representing a relevant area of the public interest
- Any person who has an interest in the proposed plan change greater than the interest the general public has
- The local authority itself (i.e., Horizons)².

In a further submission you are limited to a matter in support or opposition to the original submission; you cannot introduce a new topic through a further submission³.

You must make your submission before **5pm on Tuesday 3 December 2019** using the form prescribed through the RMA ([Form 6](#)). An electronic version of this form is available via Horizons' website, www.horizons.govt.nz. You can make a written or electronic further submission to Horizons in any of the following ways:

- Use the online submission form [here](#);
- Deliver your submission to the Horizons offices at 11-15 Victoria Avenue, Palmerston North;
- Email your submission to submissions@horizons.govt.nz; or
- Post your submission to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442.

Each submitter and decision requested ('submission point') has been given a unique number for you to reference if you are making a further submission. For example, if you wished to make a further submission on the third decision ('statement#') requested by Griffins Foods Ltd (submitter number 1), you would reference submission point 1/3.

IMPORTANT: A copy of your further submission must be sent to the person who made the original submission within 5 working days of making your further submission to the Regional Council⁴. This can be via email; submitters' email addresses, where given, are listed below.

¹ Schedule 1 Clauses 7, 8 and 8A

² Clause 8(1)

³ Clause 8(2)

⁴ Clause 8A

Summary of submissions vs original submissions

It is recommended that you use this summary to identify any submissions and submission points you may wish to comment on and then access the original – all submissions are available on Horizons' website.

- This document includes limited information copied from the original submission. Many submissions include a great deal more background information and detailed reasons or context for their requests.
- Some submitters do not set out an explicit request for a change or decision in their submission; when this happens, officers have made their best effort to infer what the submitter is requesting.
- Where submitters have requested changes to planning provisions using track changes, the requested wording will be much clearer in the original submission. Where these have been created using the PC2 track changes version as their base, the track changes on the base document are not visible in this summary document.

Some other things to note

Please note that all further submissions are public. They will be published in full on the Horizons website and in documents that are available to the public and media, following the close of the further submission period. This is because plan change processes carried out under the Resource Management Act 1991 are public processes. Your further submission will only be used for the purpose of the plan change or variation process.

There are some gaps in the numerical sequence of submitters. One submitter has advised Horizons that they have chosen to withdraw their submission; to avoid doubt, the submission number (64) has been allocated 'Withdrawn'. Number 86 was allocated to this submitter's request to withdraw. Number 77 was found to be a duplicate of another submission and has not been included.

Three submissions were received after 5pm on October 21 2019. The time period was waived on behalf of Council under delegated authority, and these submissions have been incorporated into the Summary of Submissions.

Original Submitters by Submitter Number

(including email address, where given)

1	Griffins Foods Ltd	michael.macmillan@griffins.co.nz
2	Ruapehu District Council	info@ruapehudc.govt.nz
3	Lisa Charmley	paul_charmley@yahoo.co.nz
4	Kahungunu ki Tāmiki nui-a-Rua Trust	administration@kahungunutnar.co.nz
5	BakerAg NZ Limited	rob@bakerag.co.nz
6	Andrew Yung	awyung@xtra.co.nz
7	Tommy Young	tandayoung@xtra.co.nz
8	David Young	dbyoung@xtra.co.nz
9	Gordon Sue	
10	Nigel Sue	
11	Andy Pescini	
12	John Young	john_young2006@hotmail.com
13	Cameron Lewis	
14	Jeffery Wong	
15	John Clarke	
16	Chris Pescini	pescinibros@gmail.com
17	Harry Bi	xingzhuobi@outlook.co.nz
18	Jin Wen Luo	
19	Mei Hao Su	
20	Peter Young	growerpete@outlook.com
21	Norman Young	normanyoung30@yahoo.com
22	Terry Olsen	tbolsen21@yahoo.com
23	Michael Moleta	freshpikfarms@xtra.co.nz
24	Jason Leong	
25	Jin Luo	
26	Bo Sue	
27	Travis Sue	
28	Jung Bros	tqcahome@hotmail.com
29	DC and SK Sue LTD T/A Garden of york	
30	Daj-Chung Sue	
31	Adam Jory	adam_jory@hotmail.com
32	Pescini Bros	
33	Peter Young	
34	Xingzhuo BI	
35	Whelan Sue	whelan.sue@gmail.com
36	Tony Jung	tqcahome@hotmail.com
37	Paul Olsen	olsenagri@xtra.co.nz
38	HK Young	

39	Minxian Luo (Maggie)	maggie88310@hotmail.com
40	DairyNZ Limited	adam.duker@dairynz.co.nz
41	Mike Moleta on behalf of Freshpik Farms Ltd	freshpikfarms@xtra.co.nz
42	Horowhenua District Council	
43	Ohakune Growers Association	ronpeggyfrew@xtra.co.nz
44	Ian Corbetts	iancorbetts@xtra.co.nz
45	Ravensdown Limited	carmen@planzconsultants.co.nz
46	The Arawhata Wetland Alliance Group (AWA Group)	bjcduffy@gmail.com
47	Ian Grant & Anne Shirley Cumming	
48	Sarah von Dadelszen	hinerangistn@xtra.co.nz
49	Geoff and Cynthia Kane	kanevale@xtra.co.nz
50	John William Thomas Lamason	j.dlamason@farmside.co.nz
51	Mark Thomas Woodruffe	
52	Russell and Karen Phillips, Waka Dairies Ltd	russell.phillips@xtra.co.nz
53	Andrew Day	andrew-day@xtra.co.nz
54	Environmental Defence Society Incorporated	cordelia@eds.org.nz
55	Wellington Fish & Game Council	pteal@fishandgame.org.nz
56	BEL Group	rob@belgroup.co.nz
57	Woodhaven Gardens Ltd	jayclarke@woodhavengardens.co.nz
58	Federated Farmers of New Zealand Inc	cmatena@fedfarm.org.nz
59	Forest & Bird	t.kay@forestandbird.org.nz
60	Tararua Growers Association	tbolsen21@yahoo.co.nz
61	Director-General of Conservation	
62	Muaūpoko Tribal Authority Inc	admin@muaupoko.iwi.nz
63	Ngā Waihua o Paerangi Trust	office@ngatirangi.com
64	WITHDRAWN	
65	Water Protection Society	wps@inspire.net.nz
66	Horticulture New Zealand	michelle.sands@hortnz.co.nz
67	Ngāti Turanga	hayden@raukawa.iwi.nz
68	Te Roopū Taiao o Ngāti Whakatere Trust	Whakatere.taiao@gmail.com
69	Neil Filer	neilorron@xtra.co.nz
70	Te Rūnanga o Raukawa	jess@raukawa.iwi.nz
71	Joanne Meri Teresa Heperi (on behalf of Rangitāne o Tamaki Nui a Rua)	heyitsmejoey@gmail.com
72	Ballance Agri-Nutrients Limited	dominic.adams@ballance.co.nz
73	Vincent John Payne	windwoods@xtra.co.nz
74	Beef + Lamb New Zealand	
75	Potatoes New Zealand	accounts@potatoesnz.co.nz
76	Hokio A Maori Land Trust	vivienne.taueki@xtra.co.nz
78	Parlato Farming Company	tonyandamber@xtra.co.nz
79	Tararua District Council	peter.wimsett@tararoadc.govt.nz
80	Carla Marsden	carlarmoore@yahoo.com

81	Jill Sheehy	jillsheehy@xtra.co.nz
82	Palmerston North City Council, Manawatū, Horowhenua, Ruapehu & Tararua District Councils (The Combined Councils)	melaina.voss@pncc.govt.nz
83	Palmerston North City Council	melaina.voss@pncc.govt.nz
84	Tamarangi Hapu of Muaupoko	vivienne.taueki@xtra.co.nz
85	Te Mauri o Rangitāne o Manawatū (Council of Elders) Tanenuiarangi Manawatū Incorporated (Iwi Authority)	siobahn@rangitaane.iwi.nz
87	Manawatū District Council	public@mdc.govt.nz

Submitter Number: 1

Griffins Foods Ltd
PO Box 76072

Manukau City, Auckland
2241

Michael Macmillian

Summary of Decision(s) Requested for Submitter Number: 1

Statement#	Topic	Decision Requested
1	GEN	I support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.
3	GEN	Support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. Consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.
4	GEN	Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.

Submitter Number: 2

Ruapehu District Council
Private Bag 1001

Taumarunui
3946

Anne-Marie Westcott

Summary of Decision(s) Requested for Submitter Number: 2

Statement#	Topic	Decision Requested
1	GEN	An investigation into the use of Overseer as a viable option for the future.
2	GEN	Pathways be created for new intensive farming land uses to meet the needs and expectations of the RMA through the One Plan.
3	GEN	Ensure that local engagement takes place with stakeholders involved when setting the parameters of individual catchment developments and not take a one size fits all approach (should HRC continue with the proposed changes of PC2).
4	GEN	To assist in clear local engagement, PC2 should provide clear guidance to decision makers in terms of permissible activities.
5	14	Deletion of Table 14.2
6	GEN	New development of policies that provide pathways for both existing and new intensive farm land uses, while giving effect to the environmental, cultural, social and economic impacts of the affected water managements sub zones.
7	GEN	RDC supports the joint submission from the local territorial authorities across the Manawatu-Whanganui Region.

Submitter Number: 3

**Lisa Charmley
239 Te Rehunga South Road
2
Dannevirke
4972**

Summary of Decision(s) Requested for Submitter Number: 3

Statement#	Topic	Decision Requested
1	5	Amend Policy 5-8 as requested by DairyNZ and Federated Farmers in their submission.
2	5	Amend Method 5-12 as requested by DairyNZ and Federated Farmers in their submission.
3	5	Amend Method 5-13 as requested by DairyNZ and Federated Farmers in their submission.
4	14	Amend Policy 14-3 as requested by DairyNZ and Federated Farmers in their submission.
5	14	Amend Policy 14-5 as requested by DairyNZ and Federated Farmers in their submission.
6	14	Amend Policy 14-6 as requested by DairyNZ and Federated Farmers in their submission.
7	14	Amend 14.1 to 14.2A Rules - Agricultural Activities as requested by DairyNZ and Federated Farmers in their submission
8	14	Amend 14.1 to 14.2A Rules - Agricultural Activities as requested by DairyNZ and Federated Farmers in their submission.
9	14	Amend 14.1 to 14.2A Rules - Agricultural Activities as requested by DairyNZ and Federated Farmers in their submission.
10	GL	Amend definitions as requested by DairyNZ and Federated Farmers in their submission [includes adding new definitions for 'nitrogen baseline' and '75th percentile nitrogen leaching loss'].

Submitter Number: 4

**Kahungunu ki Tāmiki nui-a-Rua Trust
PO Box 97**

**Dannevirke
4930
Stacey Hape**

Summary of Decision(s) Requested for Submitter Number: 4

Statement#	Topic	Decision Requested
1	5	<p>Re-instatement of clause in Policy 5-8 (a)(i) '(B) will achieve the strategies for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6', and any consequential amendments to the proposed plan for consistency with the above.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
2	14	<p>A requirement for intensive land use consents to meet the nitrogen allocation table unless a robust assessment of effects can demonstrate an improvement in water quality (relevant to the property and water management zone) and provides a timeline and pathway towards meeting nutrient limits and targets.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
3	14	<p>Reinstatement of the following into proposed Policy 14-6: -</p> <p>'Where an exception is made to the cumulative nitrogen leaching maximum* the existing intensive farming land[^] uses must be managed by consent conditions to ensure:</p> <p>(i) Good management practices to minimise the loss of nitrogen, phosphorus, faecal contamination and sediment are implemented.</p> <p>(ii) Any losses of nitrogen, which cannot be minimised, are remedied or mitigated, including by other works or environmental compensation. Mitigation works may include but are not limited to, creation of wetland and riparian planted zones'.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
4	14	<p>Amend proposed Policy 14-6 (d)(i) as follows:</p> <p>'Good management practices* are implemented in accordance with a nutrient management plan*, along with additional innovations, timelines, targets and measures to further progressively reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land[^] progressively over time; or' .</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
5	14	<p>Provide clear linkage between Policy 14-6 and the relevant Schedule B values.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
6	GEN	<p>Where BPOs and GMPs are promoted, include taking into account nutrient losses from farm drainage systems (tile, NovaFlow (or similar) and farm rains) and managing these as 'point source' discharges.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
7	5	<p>Clearly link proposed Policy 5-8 to water quality objectives.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments.</p>
8	14	<p>Consideration for the introduction of a 'non-complying' status for consent applications for intensive land use activities which exceed the allocation table figures, with requirements for applications to show a staged improvement in water quality, with clear timelines.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments</p>
9	GEN	<p>Greater consideration for the cumulative effects of multiple land-use activities within sub-catchments and water management zones, with the ultimate aim of reducing nutrients in catchments where water quality is degraded, and managing nutrients within catchment load limits.</p> <p>Any other amendments to the remainder of the proposed plan to enable consistency with the above amendments</p>

Submitter Number: 5

**BakerAg NZ Limited
8 Manchester Square**

**Feilding
4702**

Summary of Decision(s) Requested for Submitter Number: 5

Statement#	Topic	Decision Requested
1	5	No decision specified. Submitter asks "Is a change to a table going to make the rest of the Plan "workable," especially with the announcement of Central Govts freshwater plan?"
2	5	No decision requested. Submitter seeks clarification about how existing consentholders will be affected by PC2, whether they can use headroom if the revised Table 14.2 provides it, and how that may relate to the Freshwater CG plan (assume means Government's Essential Freshwater package) to "hold the line".
3	14	No decision requested. Submitter poses questions about recalibrating Table 14.2 and relationship with the recent Central Government proposals, e.g., "The proposed changes to PC One Plan's Table 14.2, which give the maximum nitrogen leaching allowed on the various classes of land, in kilograms per hectare, could be seen as contrary in that the Central Government proposal has a 5-year moratorium on any increase in "pollution" until councils have their regional plans updated. PC2 will allow land use change to increase N leaching to the PC2 limits."
4	5	No decision requested. Submitter discusses matters related to Overseer. Poses questiona: "Also, given Overseer is the modelling software used to apply Table 14.2, will the requirements under Table 14.2 be updated when new versions of Overseer are rolled out? If so, will there be consultation on any changes before they are applied?"
5	5	The table to be referenced in PC2 should be modified to clearly show the financial impact of the current One Plan rules vs PC2 rules.
6	14	PPC2 proposes the test of "meeting good management practice." This term is vague, it needs objective measures to describe what this means in practice. It should also be introduced in a reasonable timeframe that encourages and allows for compliance. Submitter also asks how Horizons will encourage "good management practice". "Where is the encouragement / positive incentives?"
7	GEN	No decision requested
8	14	Most food producers want to do the "right thing" but are being especially let down by a relatively few who either don't care or aren't worried. We think it is very important that there is encouragement and reasonable time given to those who are working to comply, and appropriate enforcement to those who are not making the necessary improvements.
9	GEN	The timeframe for implementation of PC2 needs to be clear.
10	14	PC2 needs a more detailed definition on the farm types that are included under PPC2, including mixed-use farms. These definitions must include allowances for cropping and dairy support

Submitter Number: 6

**Andrew Yung
160 Settlement Road, Te Horo
2
Otaki
5582**

Summary of Decision(s) Requested for Submitter Number: 6

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 7

**Tommy Young
3 Lynch Grove**

Levin

Summary of Decision(s) Requested for Submitter Number: 7

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 8

**David Young
302 Kimberley Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 8

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop, rotation leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 9

**Gordon Sue
69 Buller Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 9

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop, rotation leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 10

**Nigel Sue
69 Buller Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 10

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 11

**Andy Pescini
1051 Queen Street East**

Levin

Summary of Decision(s) Requested for Submitter Number: 11

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 12

**John Young
3 Gimblett Court**

Levin

Summary of Decision(s) Requested for Submitter Number: 12

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 13

**Cameron Lewis
45 Clam Road**

12

Levin

Summary of Decision(s) Requested for Submitter Number: 13

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 14

**Jeffery Wong
131 Bruce Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 14

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 15

**John Clarke
44 Joblins Road**

**1
Levin**

Summary of Decision(s) Requested for Submitter Number: 15

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 16

**Chris Pescini
650 State Highway 57**

**1
Levin**

Summary of Decision(s) Requested for Submitter Number: 16

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 17

**Harry Bi
30 Kimberley Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 17

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 18

Jin Wen Luo
70 Wakefield Road
1
Levin

Summary of Decision(s) Requested for Submitter Number: 18

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 19

Mei Hao Su
37 Barry Curtis Place

Levin

Summary of Decision(s) Requested for Submitter Number: 19

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 20

Peter Young
394 Mahunoa East Road
20
Levin

Summary of Decision(s) Requested for Submitter Number: 20

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 21

Norman Young
37 Gleeson Road

Manakau Levin
5573

Summary of Decision(s) Requested for Submitter Number: 21

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 22

**Terry Olsen
583 Okuku Road
4
Palmerston North
4474**

Summary of Decision(s) Requested for Submitter Number: 22

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 23

**Michael Moleta
693 Opiki Road
4
Palmerston North**

Summary of Decision(s) Requested for Submitter Number: 23

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 24

**Jason Leong
25 Joblins Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 24

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 25

**Jin Luo
70 Wakefield Road
1
Levin**

Summary of Decision(s) Requested for Submitter Number: 25

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 26

**Bo Sue
17 Whelans Road
1
Levin**

Summary of Decision(s) Requested for Submitter Number: 26

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 27

**Travis Sue
6 Gimblett Court**

Levin

Summary of Decision(s) Requested for Submitter Number: 27

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 28

Jung Bros

Summary of Decision(s) Requested for Submitter Number: 28

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 29

DC and SK Sue LTD T/A Garden of York

Summary of Decision(s) Requested for Submitter Number: 29

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 30

**Daj-Chung Sue
73 Arapaepae Road**

**Levin
5510**

Summary of Decision(s) Requested for Submitter Number: 30

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 31

**Adam Jory
80 Hoggs Road
20
Levin
5571**

Summary of Decision(s) Requested for Submitter Number: 31

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 32

**Pescini Bros
171 Kimberley Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 32

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 33

**Peter Young
394 Muhunoa East Road
20
Levin**

Summary of Decision(s) Requested for Submitter Number: 33

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 34

**Xingzhao BI
30 Kimberley Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 34

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 35

**Whelan Sue
128 Fairfield Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 35

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 36

**Tony Jung
26A Sussex street**

Levin

Summary of Decision(s) Requested for Submitter Number: 36

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 37

**Paul Olsen
454 Kaihinu Road
4
Palmerston North**

Summary of Decision(s) Requested for Submitter Number: 37

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 38

HK Young

Summary of Decision(s) Requested for Submitter Number: 38

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 39

Minxian Luo (Maggie)

Summary of Decision(s) Requested for Submitter Number: 39

Statement#	Topic	Decision Requested
1	GEN	Support requiring all growers to operate at good management practice.
2	GEN	Provisions be added to enable existing areas of vegetable growing to move onto different land, to account for crop rotation, leases land arrangements and to enable growers to move to less environmentally sensitive locations.

Submitter Number: 40

DairyNZ Limited
Private Bag 11222

Palmerston North
4442
Adam Duker

Summary of Decision(s) Requested for Submitter Number: 40

Statement#	Topic	Decision Requested
1	5	<p>Amend Policy 5-8 (a) as follows:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>(a) Nutrients</p> <p>(i) Nitrogen leaching maximums must be established in the regional plan which:</p> <p>(A) take into account all the non-point sources of nitrogen in the catchment</p> <p>(B) will achieve the strategies for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6</p> <p>(C) recognise the productive capability of land[^] in the Water Management Sub-zone* ***(except that this shall only apply for existing intensive farming land use activities until 2023)***</p> <p>(D) ***recognise the nitrogen leaching rates of existing farms and require reductions from those existing nitrogen leaching rates that*** are achievable on most farms using good management practices</p> <p>***(E) result in the highest nitrogen leaching intensive farming land uses needing to make the greatest nitrogen leaching reductions***</p> <p>(F) provide for appropriate timeframes for achievement where large changes to management practices or high levels of investment are required to achieve the nitrogen leaching maximums.</p> <p>(ii) Existing intensive farming land[^] use activities must be regulated in targeted Water Management Sub-zones* to achieve the nitrogen leaching maximums specified in (i) except as provided for in (iia) and (iib) below</p> <p>(iia) Existing intensive land use activities which do not comply with (ii) must be regulated to reduce nitrogen leaching which is in excess of the nitrogen leaching maximums established under (a) by implementing good ***farming*** [[management]] practices*, and additional mitigation measures to minimise the degree of non-compliance, having regard to:</p> <p>(A) the feasibility, practicality, and cost of achieving the nitrogen leaching maximums specified in (i); and</p> <p>(B) [[the strategies for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6]] ***the need to maintain water quality where it meets the relevant Schedule E water quality targets and improve water quality where it does not meet the relevant Schedule E water quality targets and the strategy for groundwater quality in Policy 5-6***</p> <p>(iib) Existing intensive land use activities which do not comply with (ii) [[but are intended to transition to an alternative non-intensive farming land use must]] ***may*** be regulated to [[ensure that they are able]] ***allow those activities*** to continue for a limited period of time ***provided that is for the purpose of*** [[in order to enable]] ***enabling*** a that transition ***to an alternative non-intensive farming land use*** and ***provided [[only where]] there is no increase in the exceedance of the nitrogen leaching maximums established under (a)</p> <p>(iii) New intensive farming land[^] use activities must be regulated throughout the Region to achieve the nitrogen leaching maximums specified in (i).</p>
2	5	Clarify that the research referred to in Method 5-12 is to focus on N loss mitigation options.
3	5	DairyNZ supports Horizons collating and publishing information on Overseer version change (and other nutrient management models). We note though that should councils accept the relief sought in this submission, the need to amend One Plan in response to Overseer version change would be reduced (ie. limited only to the calculation of leaching maximums applicable to new intensive uses). If Table 14.2 is to have an enduring role in One Plan, then there is no question that a mechanism to update the leaching maximums would need to be included in One Plan itself. Monitoring version changes and responding by way of plan change if necessary, is not an appropriate solution and contrary to all advice on the use of Overseer in regulation.
4	14	Amend Policy 14-3 as proposed in PPC2 to refer to 'good farming practice' rather than 'good management practice'

Amend clause (d) of Policy 14-5 to read:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Except as provided for in Policy 14-6(d), Existing intensive farming land uses regulated in accordance with (b)(i) must be managed ***in the following manner:

Until 30 June 2023 by*** [[to ensure] ***ensuring*** that the leaching of nitrogen from those land[^] uses does not exceed:

- ***(i)*** the cumulative nitrogen leaching maximum* values for each year contained in Table 14.2, unless the circumstances in Policy 14.6 apply; ***or whichever is the lesser of
- (ii) 90% of the leaching occurring on the land in the 2012/2013 year; and
- (iii)The 75th percentile nitrogen leaching loss* for the Surface Water Management Zone*

After 30 June 2023, by ensuring that the leaching of nitrogen from those land[^] uses does not exceed the lesser of:

- (i) 90% of the leaching occurring on the land in the 2012/2013 year; and
- (ii) The 75th percentile nitrogen leaching loss* ***

Amend Policy 14-6 clauses (d) and (e) to read as follows:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

(d) Provide for exceptions to (a) for existing intensive farming land[^] uses that exceed the [[cumulative]] nitrogen leaching [[maximum*]] ***rate specified in Policy 14-5 (d)*** where:

- (i) Good [[management]] ***farming*** practices* are implemented in accordance with a nutrient management plan*, along with additional [[innovations and]] ***mitigation*** measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land[^] progressively over time; or
- (ii) The existing intensive farming land[^] use is to continue for no longer than five years in order to enable the transition to an alternative non-intensive farming land[^] use without an increase in nutrient leaching and run-off, faecal contamination and sediment losses from the land[^] over that period of time.
- (e) When determining whether to enable an existing intensive farm land[^] use to continue under (d)(i), have regard to:
 - (i) Whether the proposed ***mitigation*** [[innovations and]] measures represent the best practicable option[^] to minimise the nutrient leaching and run-off, faecal contamination and sediment losses from the land[^], having particular regard ***(in addition to those matters set out in section 2 of the Act)*** to:
 - (A) The extent of the exceedance of the [[cumulative nitrogen leaching maximum* in Table 14.2]] ***leaching rates described in Policy 14-5 (d);***
 - (B) The rate of reduction of nitrogen loss towards the [[cumulative nitrogen leaching maximum* for any given year in Table 14.2]] ***leaching rates described in Policy 14-5 (d)***;
 - (C) Whether further reductions are currently possible for the intensive farming land[^] use based on ***mitigation measures available to farmers that have been tested and proven to be effective at a farm scale*** [[existing technologies.]]
 - (ii) The extent to which the non-compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 is attributable to updates in versions of OVERSEER;

Note (ii) above need be retained only if One Plan is not amended to allow for the updating of the Table 14.2 rates following each Overseer version change
 - (iii) The nature and characteristics of the land[^], having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property;
 - (iv) The contribution of the progressive reduction in nutrient leaching and run-off, faecal contamination and sediment losses from the land[^], over time, to the improvement of water[^] quality within that Water Management Sub-zone*;
 - (v) The strategy for [[surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for]] groundwater quality in Policy 5-6.

Retain the updated Table 14.2 subject to:

1. Including a footnote to the table indicating the version of Overseer used to derive the numbers.
2. Including the methodology used to calculate the numbers in One Plan Table 14.2 as an Appendix to One Plan.
3. Including provision in One Plan to update Table 14.2 numbers in accordance with the methodology described in 3 above, when a new version of Overseer is issued.
4. Include reference to the fact that the updating described in 4 above will be done without using a Schedule 1 process.

Retain Rule 14-1 but amend to give effect to Policy 14-5 (as proposed to be redrafted by this submission). That can be achieved by adopting the wording set out in Attachment 1 to this submission (or wording with similar effect)

From Attachment 1:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Conditions/Standards/Terms

(c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss for the land[^] will not exceed:

- ***(i)*** the cumulative nitrogen leaching maximum* specified in Table 14.2 ***; or
 - (ii) whichever is the lesser of:
 - 90% of the land's nitrogen baseline*; or
 - the 75th percentile nitrogen leaching loss* for the relevant surface water management zone*.
- Except that (i) above shall not apply to resource consent applications lodged after 30 June 2023; and***

Control/Discretion Non-Notification:

(c) management practices and measures to achieve either the cumulative nitrogen leaching maximum specified in Table 14.2 or the required reduction from any nitrogen baseline* or the 75th percentile nitrogen leaching loss

Retain Rule 14-2 but amend to be consistent with the nitrogen leaching limit approach proposed by DairyNZ. This involves an amendment to the Conditions/Standards and Terms as indicated by the redrafting provided as Attachment 1 (or wording to like effect).

From Attachment 1:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Rule:

14-2 Existing intensive farming land[^] use activities not complying with any of the conditions, standards and terms ~~[[a), (b)]]~~ (d) to (i) of Rule 14-1

Activity:

The use of land[^] pursuant to s9(2) RMA for any of the following intensive farming:

- (i) dairy farming*
 - (ii) commercial vegetable growing*
 - (iii) cropping*
 - (iv) intensive sheep and beef farming*
- that was existing as at 1 July 2010 in the Water Management Sub-zones* listed in Table 14.1, and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with intensive farming, that do not comply with one or more of the conditions[^], standards and terms of Rule 14-1 (except for ***(a) to*** (c)):

Standards/Terms/Conditions

(c) The nutrient management plan* prepared under (a) must demonstrate that that the nitrogen leaching loss for the land[^] will not exceed

- ***(i)*** the cumulative nitrogen leaching maximum* specified in Table 14.2; or
- ***(ii)*** whichever is the lesser of:
 - 90% of the land's nitrogen baseline*; or
 - the 75th percentile nitrogen leaching loss* for the relevant surface water management zone*.

Except that (i) above shall not apply to resource consent applications lodged after 30 June 2023; and The following conditions, standards and terms also apply except to the extent that consent is sought under this rule to not comply with them:

- (d) Cattle must be excluded from:
 - (i) wetlands[^] and lakes[^] that are a rare habitat* or threatened habitat*, and
 - (ii) the beds[^] of rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, other than at any specific location where access is required for dairy cattle to cross the river[^] in which case (e) applies.
- (e) Rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, that are crossed by cattle must be bridged or culverted, and the cattle must cross via that bridge or culvert, and run-off originating from the carriageway of the bridge or culvert must be discharged[^] onto or into land[^].
- (f) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.
- (g) The discharge[^] of contaminants[^] onto or into land[^] from:
 - (i) the preparation, storage, use or transportation of stock feed on production land[^], or
 - (ii) the use of a feedpad*
 and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-6.
- (h) The discharge[^] of grade Aa biosolids*, soil conditioners* or compost* onto or into production land[^] and any

ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-7.

(i) The discharge[^] of poultry farm litter* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-9.

(j) The discharge[^] of farm animal effluent* onto or into production land[^] including:

(i) effluent from dairy sheds and feedpads*(ii) effluent received from piggeries

(iii) sludge from farm effluent ponds

(iv) poultry farm effluent

and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^], standards and terms of Rule 14-11.***

Control/Discretion Non-Notification

(b) (c) measures good ***farming*** [[management]] practices to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land[^]

10 14

Retain Rule 14-2A with the minor amendments shown in Attachment 1

From Attachment 1:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Activity:

The use of land[^] pursuant to s9(2) RMA for any of the following ***types of*** intensive farming:

(i) dairy farming*

(ii) commercial vegetable growing*

(iii) cropping*

(iv) intensive sheep and beef farming*

that was existing in the Water Management Sub-zones* listed in Table 14.1 and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming, that do not comply with conditions[^], standards and term ***a)-***(c) of Rule 14-1 or [[one or more of the conditions[^], standards and terms of]] Rule 14-2:

11 GL

Amend the definition as notified to

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Good [[management]] ***farming*** practices refers to evolving practical measures and methods, including those established in industry-based standards, which are used at a [[sector or community]] ***farm*** level to minimise the effects of discharges to land[^] and water[^].

12 GL

Retain the definition as notified.

13 GL

Include a definition of nitrogen baseline as follows:

[Note: text between the ***s is underline to signify text sought to be added.]

Nitrogen baseline means the discharge of nitrogen below the root zone, as modelled with Overseer, or equivalent model approved by the Chief Executive of Horizons Regional Council, for the period 1 July 2012 to 30 June 2013. If an updated version of Overseer is issued, the most recent version is to be used to recalculate the nitrogen baseline* using the same nitrogen related farm input data as used for the 1 July 2012 to 30 June 2013 period.

14 GL

Include a definition of 75th percentile nitrogen leaching loss as follows:

[Note: text between the ***s is underline to signify text sought to be added.]

75th percentile nitrogen leaching loss means the 75th percentile value (units of kg N/ha/year) of all of the nitrogen baseline* values for dairy farming activities in the Surface Water Management Zone* as determined for each Surface Water Management Zone*. The 75th percentile nitrogen leaching loss* is recalculated each time the nitrogen baseline is updated following release of a new version of Overseer.

Submitter Number: 41

Mike Moleta on behalf of Freshpik Farms
693 Opiki Road, Opiki
4
Palmerston North

Summary of Decision(s) Requested for Submitter Number: 41

Statement#	Topic	Decision Requested
1	GEN	Support a performance-based method for tallying nutrient losses related to horticultural management practices. The potato sector is supporting a more accurate "direct measurement" based approach and in my view that is appropriate for the industry.
2	GEN	Support requiring all growers to operate at good management practice.
3	GEN	Provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.
4	GEN	Enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigations schemes and should be expressly provided for in the Plan.
5	GEN	Where this submission aligns with PotatoesNZ and Horticulture NZ submissions, I also support those submissions.

Submitter Number: 42

Horowhenua District Council
Private Bag 4002

Levin
5540
The Chief Executive

Summary of Decision(s) Requested for Submitter Number: 42

Statement#	Topic	Decision Requested
1	GEN	PC2 be withdrawn and transitioned to a collaborative planning process as set out in Part 4, Schedule 1 of the RMA. Or in the alternative, without prejudice to the decision requested, such other relief as will achieve the reasons for the Council's submission.
2	GEN	On the basis of the specific comments above relating to wastewater management schemes, Council seeks that PC2 needs to be amended to, as a minimum, exclude areas which receive municipal wastewater applications to land from needing to meet Table 14-2 N leaching limits and that municipal wastewater applications be provided for by an alternative policy framework similar to Policy 5-6 in the Regional Plan intensive land use provisions. Or in the alternative, without prejudice to the decision requested, such other relief as will achieve the reasons for the Council's submission.

Submitter Number: 43

Ohakune Growers Association
1020 Raetihi Rd

Ohakune
4625
Ron Frew, President

Summary of Decision(s) Requested for Submitter Number: 43

Statement#	Topic	Decision Requested
1	GEN	Propose a tailored approach for commercial vegetable production. This is required if land with high production value is to be realised for its food production purpose, while achieving catchment wide water quality improvements.
2	GEN	Support requiring all growers to operate at good environmental management practice.
3	GEN	Propose provisions be added to enable existing areas of vegetable growing to move onto different land. This provision is required for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations where lease arrangements provide that opportunity.

Submitter Number: 44

**Ian Corbetts
1546 Kimbolton Road
7
Feilding**

Summary of Decision(s) Requested for Submitter Number: 44

Statement#	Topic	Decision Requested
1	GEN	Support a performance-based method for tallying nutrient losses related to horticultural management practices. The potato sector is supporting a more accurate "direct measurement" based approach and in my view that is appropriate for the industry.
2	GEN	Support requiring all growers to operate at good management practice.
3	GEN	Provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.
4	GEN	Enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigations schemes and should be expressly provided for in the Plan.
5	GEN	Where this submission aligns with PotatoesNZ and Horticulture NZ submissions, I also support those submissions.

Submitter Number: 45

Ravensdown Limited
PO Box 1845

Christchurch
8140
Carmen Taylor, Consultant Planner

Summary of Decision(s) Requested for Submitter Number: 45

Statement#	Topic	Decision Requested
1	5	<p>Retain the amendments to the first part of Policy 5-8 as notified, as follows:</p> <p>"Policy 5-8: Management and Rregulation of intensive farming land^ use activities affecting groundwater and surface water^ quality</p> <p>In order to give effect to Policy 5-7, the effects of intensive farming land^ use activities on groundwater and surface water^ quality must be managed in the following manner: ..."</p>
2	5	<p>Amend Policy 5-8(a) - Nutrients, as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]</p> <p>"Nutrients</p> <p>(i) Nitrogen leaching maximums must be established in the regional plan which:</p> <p>(A) take into account all the non-point sources of nitrogen in the catchment</p> <p>(B) will achieve the strategies for surface water^ quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6</p> <p>(B) (C) recognise the productive capability of land^ in the Water Management Sub-zone*</p> <p>(C) (D) are achievable on most farms using good management practices*</p> <p>(D) (E) provide for appropriate timeframes for achievement where large changes to management practices or high levels of investment are required to achieve the nitrogen leaching maximums.</p> <p>(ii) Existing intensive farming land^ use activities must be regulated in targeted Water Management Sub-zones* to achieve the nitrogen leaching maximums specified in (i) except as provided for in (iia) and (iib) below.</p> <p>(iia) Existing intensive land^ use activities which do not comply with (ii) must be regulated to reduce nitrogen leaching which is in excess of the nitrogen leaching maximums established under (a) by implementing good management practice*, and additional measures to minimise ***nitrogen leaching*** [[the degree of non-compliance]], having regard to:</p> <p>(A) the feasibility, practicality, and cost of achieving ***the*** nitrogen leaching ***reductions*** [[maximums specified in (i)]]; and</p> <p>(B) the strategy for surface water^ quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6.</p> <p>(iib) Existing land^ use activities which do not comply with (ii) but are intended to transition to an alternative non-intensive farming land^ use must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition and only where there is no increase in the [[exceedance of the]] nitrogen leaching ***losses from the existing land^ use activity*** [[maximums established under (a)]].</p> <p>(iii) New intensive farming land^ use activities must be regulated throughout the Region to achieve the nitrogen leaching maximums specified in (i)."</p>
3	5	<p>Amend 5-8(d) - Good management practices*, as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]</p> <p>"Good management practices*</p> <p>(i) All intensive farming land^ use activities must [[be regulated to]] ***manage*** nutrient leaching and run-off, faecal contamination, and sediment losses in accordance with good management practices*"</p>

4	5	<p>Amend Method 5-12, as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]</p> <p>"Description Support initiatives by local communities, sector groups or tangata whenua which develop options for sustainable land use in the Region. Support for work in Water Management Sub-zones* where nitrogen leaching is an issue, ***as identified in Table 14.1,*** will be a priority in order to find viable options for intensive farming land users ***to sustainably reduce nitrogen leaching from their farming activities*** [[that will have difficulty in achieving the cumulative nitrogen leaching maximums* (refer Table 14.1).]] Horizons will provide assistance through providing data and information that will assist in the identification and evaluation of innovative land use options and participating in any evaluative work as appropriate. Who Local communities, rural and other sector groups, Territorial Authorities, Regional Council. Links to Policy This method implements Policies 5-7 and 5-8. Target Advice and assistance is available for landowners in the Region regarding land use management practices."</p>
5	5	<p>Amend Method 5-12, [sic] as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]</p> <p>"Description Horizons will collate and publish information regarding Overseer [[version changes]] and the identification and evaluation of nutrient management models other than Overseer that may be more appropriate for calculation of on-farm nutrient losses. Who Regional Council, rural sector groups, and nutrient management model providers. Links to Policy This method implements Policy 5-8. Target — Horizons will consider whether it needs to respond to changes in Overseer through a plan change process. — A list of nutrient management models appropriate for use in intensive farming land is maintained on Horizons' website."</p>
6	14	<p>Retain the amendments to Policy 14-3 as notified, as follows: "Policy 14-3: Industry-based standards Good management practices* When making decisions on resource consent^ applications, and setting consent conditions, for activities affecting groundwater and surface water^ quality, Tthe Regional Council must have regard to good management practices* will examine on an on-going basis relevant industry-based standards (including guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards good management practices* address the matters in Policies 14-1, 14-2, 14-4, and 14-5 and 14-6."</p>
7	14	<p>Retain the amendments to Policy 14-5 as notified, as follows: "Policy 14-5: Management of intensive farming land^ uses In order to give effect to Policy 5-7 and Policy 5-8, intensive farming land^ use activities affecting groundwater and surface water^ quality must be managed in the following manner: (a) The following land uses have been identified as intensive farming land^ uses: (i) Dairy farming* (ii) Commercial vegetable growing* (iii) Cropping* (iv) Intensive sheep and beef* (b) The intensive farming land^ uses identified in (a) must be regulated where: (i) They are existing (ie., established prior to the Plan having legal effect) intensive farming land^ uses, in the targeted Water Management Sub-zones*identified in Table 14.11. (ii) They are new (ie., established after the Plan has legal effect2) intensive farming land^ uses, in all Water Management Subzones* in the Region. (c) Nitrogen leaching maximums have been established in Table 14.2. (d) Except as provided for in Policy 14-6(d), Eexisting intensive farming land^ uses regulated in accordance with (b)(i) must be managed to ensure that the leaching of nitrogen from those land^ uses does not exceed the cumulative nitrogen leaching maximum* values for each year contained in Table 14.2, unless the circumstances in Policy 14-6 apply. (e) New intensive farming land^ uses regulated in accordance with (b)(ii) must be managed to ensure that the leaching of nitrogen from those land^ uses does not exceed the cumulative nitrogen leaching maximum* values for each year contained in Table 14.2. ..."</p>

Amend Policy 14-, as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]

"Policy 14-6: Resource consent decision-making for intensive farming land^A uses

When making decisions on resource consent^A applications, and setting consent conditions^A, for intensive farming land^A uses the Regional Council must:

- (a) Ensure the nitrogen leaching from the land^A is managed in accordance with Policy 14-5.
- (b) Ensure implementation of good management practices* to manage nutrient leaching and run-off, faecal contamination and sediment loss, as part of any intensive farming land^A use.

An exception may be made to (a) for existing intensive farming land^A uses in the following circumstances:

- (i) where the existing intensive farming land^A use occurs on land that has 50% or higher of LUC Classes IV to VIII and has an average annual rainfall of 1500 mm or greater; or
- (ii) where the existing intensive farming land^A use cannot meet year 1 cumulative nitrogen leaching maximums* in year 1, they shall be managed through conditions on their resource consent to ensure year 1 cumulative nitrogen leaching maximums* are met within 4 years.

Where an exception is made to the cumulative nitrogen leaching maximum* the existing intensive farming land^A uses must be managed by consent conditions to ensure:

- (i) Good management practices to minimise the loss of nitrogen, phosphorus, faecal contamination and sediment are implemented.
- (ii) Any losses of nitrogen, which cannot be minimised, are remedied or mitigated, including by other works or environmental compensation. Mitigation works may include but are not limited to, creation of wetland and riparian planted zones.
- (c) Ensure that cattle are excluded from surface water in accordance with Policy 14-5 (f) and (g) except where landscape or geographical constraints make stock exclusion impractical and the effects of cattle stock movements are must be avoided, remedied or mitigated. In all cases any unavoidable losses of nitrogen, phosphorus, faecal contamination and sediment are remedied or mitigated by other works or environmental compensation. Mitigation works may include (but are not limited to) creation of wetland and riparian planted zones.
- (d) Provide for exceptions to (a) for existing intensive farming land^A uses that exceed the cumulative nitrogen leaching maximum* where:
 - (i) Good management practices* are implemented in accordance with a nutrient management plan*, along with additional innovations and measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land^A progressively over time; or
 - (ii) The existing intensive farming land^A use is to continue for no longer than five years in order to enable the transition to an alternative non-intensive farming land^A use without an increase in nutrient leaching and run-off, faecal contamination and sediment losses from the land^A over that period of time.
- (e) When determining whether to enable an existing intensive farm land^A use to continue under (d)(i), have regard to:
 - (i) Whether the proposed innovations and measures [[represent the best practicable option^A to]] ***will*** minimise the nutrient leaching and run-off, faecal contamination and sediment losses from the land^A, having particular regard to:
 - (A) The extent of the exceedance of the cumulative nitrogen leaching maximum* in Table 14.2;
 - (B) The rate of reduction of nitrogen loss [[towards the cumulative nitrogen leaching maximum* for any given year in Table 14.2]];
 - (C) Whether further reductions are currently possible for the intensive farming land^A use based on existing technologies.
 - [[(ii) The extent to which the non-compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 is attributable to updates in versions of OVERSEER;]]
 - *** (ii) *** [[(iii)]]] The nature and characteristics of the land^A, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property;
 - *** (iii) *** [[(iv)]]] The contribution of the progressive reduction in nutrient leaching and run-off, faecal contamination and sediment losses from the land^A, over time, to the improvement of water^A quality within that Water Management Sub-zone*;
 - *** (iv) *** [[(v)]]] The strategy for surface water^A quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6.
 - (f) When determining whether to enable the existing intensive farming land^A use to continue under (d)(ii), have regard to:
 - (i) Measures implemented in accordance with a nutrient management plan* to ensure that nutrient leaching and run-off, faecal contamination and sediment losses from the land^A do not increase over the duration of the resource consent^A;
 - (ii) good management practices* proposed to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land^A;
 - (iii) the nature, sequencing, measurability and enforceability of any steps proposed to transition out of the intensive farming land^A use by the expiry of the resource consent^A.

..."

9	14	<p>While there will continue to be ongoing issues associated with the use of the 'cumulative nitrogen leaching maximum', as contained in Table 14.2, retain the table as amended by PPC2 given its use as a resource management tool throughout the One Plan; AND,</p> <p>Amend Table 14.2 by identifying the version of Overseer (version 6.3.1) that was used to calculate the leaching values contained in this table.</p>
10	14	<p>Retain the amendments to Rule 14-1 as notified, as follows:</p> <p>"Control is reserved over:</p> <p>...</p> <p>(b) compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land^</p> <p>...</p> <p>(i) the matters in Policyies 14-5, 14-6 and 14-9."</p>
11	14	<p>Retain the amendments to Rule 14-2 as notified, as follows:</p> <p>"Activity</p> <p>The use of land^ pursuant to s9(2) RMA for any of the following intensive farming:</p> <p>(i) dairy farming*</p> <p>(ii) commercial vegetable growing*</p> <p>(iii) cropping*</p> <p>(iv) intensive sheep and beef farming*</p> <p>that was existing in the Water Management Sub-zones* listed in and from the dates specified in Table 14.1, and any of the following discharges^ pursuant to ss15(1) or 15(2A) RMA associated with intensive farming, that do not comply with one or more of the conditions^, standards and terms of Rule 14-1 (except for (c)):</p> <p>(a)</p> <p>Conditions/Standards/Terms</p> <p>(a) A nutrient management plan* must be prepared for the land^, and provided annually to the Regional Council.</p> <p>(b) The activity must be undertaken in accordance with the nutrient management plan* prepared under (a).</p> <p>(c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss from the activity will not exceed the cumulative nitrogen leaching maximum* for any year in Table 14.2.</p> <p>Control/Discretion</p> <p>Non-Notification</p> <p>Discretion is restricted to:</p> <p>(a) ...</p> <p>(b) the extent of non-compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2</p> <p>(b) (c) measures good management practices* to avoid, remedy or mitigate nutrient leaching and runoff, faecal contamination and sediment losses from the land^</p> <p>..."</p>
12	14	<p>Retain Rule 14-2A as notified, as follows:</p> <p>"Activity</p> <p>The use of land^ pursuant to s9(2) RMA for any of the following intensive farming:</p> <p>(i) dairy farming*</p> <p>(ii) commercial vegetable growing*</p> <p>(iii) cropping*</p> <p>(iv) intensive sheep and beef farming*</p> <p>that was existing in the Water Management Sub-zones* listed in and from the dates specified in Table 14.1, and any of the following discharges^ pursuant to ss15(1) or 15(2A) RMA associated with intensive farming, that do not comply with conditions, standards and term (c) of Rule 14.1 or one or more of the conditions^, standards and terms of Rule 14-2:</p> <p>(f) ..."</p> <p>AND,</p> <p>Amend the Conditions (f) to (j), to Conditions (a) to (e).</p>
13	GL	<p>Amend the definition of 'good management practices', as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]</p> <p>"refers to evolving practical measures and methods, including those established in industry-based ***guidance documents*** [[standards]], which are used at a sector or community level to minimise the effects of discharges to land^ and water^."</p>

Amend the definition of 'nutrient management plan', as follows, with amendments shown in shaded and double underlined or strike-through text: [NOTE: text between the *** is underline to signify text sought to be added; text inside double brackets is sought to be deleted.]

"means a plan prepared annually in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers' Research Association 2007) which records (including copies of the OVERSEERr ~~[[input and output files of~~
a]] ***information used in and derived from the~~***~~ recognised nutrient management model used to prepare the plan) and takes into account all sources of nutrients for intensive farming and identifies all current and relevant nutrient management practices and mitigations, and which is prepared by a person who has both a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University."

Submitter Number: 46

**The Arawhata Wetland Alliance Group
12 Lakeland Grove**

**Levin
5510**

Summary of Decision(s) Requested for Submitter Number: 46

Statement#	Topic	Decision Requested
1	GEN	That Plan Change 2 be withdrawn. Or in the alternative, transitioned to a collaborative planning process as set out in Part 4, Schedule 1 of the Resource Management Act 1991. Or in the alternative, without prejudice to the decision requested, such other relief that will achieve the reasons for the AWA Group's submission.

Submitter Number: 47

**Ian Grant & Anne Shirley Cumming
165 Ormond Road
3
Woodville**

Summary of Decision(s) Requested for Submitter Number: 47

Statement#	Topic	Decision Requested
1	5	Amend Policy 5-8 as requested by DairyNZ and Federated Farmers in their submission.
2	5	Amend Method 5-12 as requested by DairyNZ and Federated Farmers in their submission.
3	5	Amend Method 5-13 as requested by DairyNZ and Federated Farmers in their submission.
4	14	Amend Policy 14-3 as requested by DairyNZ and Federated Farmers in their submission.
5	14	Amend Policy 14-5 as requested by DairyNZ and Federated Farmers in their submission.
6	14	Amend Policy 14-6 as requested by DairyNZ and Federated Farmers in their submission.
7	14	Amend Rules 14-1 to 14.2A as requested by DairyNZ and Federated Farmers in their submission.
8	14	Amend Rules 14-1 to 14-2A as requested by DairyNZ and Federated Farmers in their submission.
9	14	Amend Rules 14-1 to 14-2A as requested by DairyNZ and Federated Farmers in their submission.
10	GL	Amend definitions as requested by DairyNZ and Federated Farmers in their submission.

Submitter Number: 48

**Sarah von Dadelszen
615 Hinerangi Road
R D 1
Waipukurau
4281**

Summary of Decision(s) Requested for Submitter Number: 48

Statement#	Topic	Decision Requested
1	5	Policy 5-8 Amend this policy as requested by Fed farmers and DairyNZ in their submission. I seek a reasonable consenting pathway for existing intensive (Horizons words) farming activities as proposed by Dairy NZ and Fed Farmers submissions
2	5	Method 5-12 Amend this as requested by Dairy NZ and Fed farmers in their submission. I agree with Fed farmers and Dairy NZ not to lock farmers into the CNLMs or require farmers to meet these targets. I do agree with finding reasonable solutions and working together with Council to look at how high numbers can be reduced. I do not see N as being the big issue it is made out to be, Phosphates and sediment can be but N on its own is not the worst thing for our rivers as depicted in the plan.
3	5	Method 5-13 Amend this method as requested by Dairy NZ and fed farmers in their submission. I am very concerned about the continued reliance on overseer and retaining the LUC approach through table 14.2. Overseer was not developed for this and the science is not good enough for us as farmers to need to rely on it for compliance. I do not therefore know how future version changes to overseer will impact on us, or our ability to meet the LUC numbers.
4	14	Policy 14-3 Amend Policy as requested by DairyNZ and Federated farmers in their Submission. I am concerned how this will be defined, open to interpretation and this seems to change constantly. We need some certainty.
5	14	Policy 14-5 Amend as requested by DairyNZ and Fed farmers in their submission. We need greater certainty as to when the rules apply from and what is treated as existing farming and what year we are in terms of Table 14.2. We need a reasonable timeframe for any reductions to occur. Also where they are already at a reasonable level, and many are that no further requirement is made to continue to lower them.
6	14	Policy 14-6 Amend as requested by DairyNZ and Fed farmers in their submission. Table 14.2 numbers do not change, despite overseer updates that model new numbers on farm. There could also be other science information and measurements that get developed that make overseer obsolete. There is no provision for this.
7	14	Policy 14.1 to 14.2A [Assumed from the subsequent text that submitter meant rules not policies] Amend these rules as requested by DairyNZ and Fed farmers in their submission. I agree that plan change 2 is an interim solution and that a more durable and flexible solution (given that scientific facts needs to be the basis of any solution) needs to be a priority for the council and the whole community. Remembering that the community also requires sound economic outputs and strong wellbeing from its food producers and those associated with the industry. The last two points need to be part of any solution. Nitrogen cannot be looked at in isolation.
8	14	Policy 14.1 to 14.2A [Assumed from subsequent text that the submitter meant rules not policies] Amend these rules as requested by DairyNZ and Fed farmers in their submission. I agree that plan change 2 is an interim solution and that a more durable and flexible solution (given that scientific facts needs to be the basis of any solution) needs to be a priority for the council and the whole community. Remembering that the community also requires sound economic outputs and strong wellbeing from its food producers and those associated with the industry. The last two points need to be part of any solution. Nitrogen cannot be looked at in isolation.
9	14	Policy 14.1 to 14.2A [Assumed from the subsequent text that submitter meant rules not policies] Amend these rules as requested by DairyNZ and Fed farmers in their submission. I agree that plan change 2 is an interim solution and that a more durable and flexible solution (given that scientific facts needs to be the basis of any solution) needs to be a priority for the council and the whole community. Remembering that the community also requires sound economic outputs and strong wellbeing from its food producers and those associated with the industry. The last two points need to be part of any solution. Nitrogen cannot be looked at in isolation.

Submitter Number: 49

**Geoff and Cynthia Kane
38 Tavistock Road**

Levin

Summary of Decision(s) Requested for Submitter Number: 49

Statement#	Topic	Decision Requested
1	GEN	No decision requested
2	GEN	I support the submission of Fed. Farmers and DairyNZ that gives another pathway for those that cannot achieve base figures but can achieve a 10% drop. - 75th percentile.

Submitter Number: 50

John William Thomas Lamason

**R D 2
Dannevirke**

Summary of Decision(s) Requested for Submitter Number: 50

Statement#	Topic	Decision Requested
1	GEN	Why not amend the one plan policy to provide a pathway to provide a discretionary consent that will give us some peace of mind and work from there.

Submitter Number: 51

**Mark Thomas Woodruffe
Snellgrove Road
2
Marton
4788**

Summary of Decision(s) Requested for Submitter Number: 51

Statement#	Topic	Decision Requested
1	14	Go ahead with the proposed plan change 2

Submitter Number: 52

Russell and Karen Phillips, Waka Dairies
441 Kumeti Road
2
Dannevirke
4972

Summary of Decision(s) Requested for Submitter Number: 52

Statement#	Topic	Decision Requested
1	5	Amend Policy 5-8 as requested by DairyNZ and Federated Farmers in their submission.
2	5	Amend Method 5-12 as requested by DairyNZ and Federated Farmers in their submission.
3	5	Amend Method 5-13 as requested by DairyNZ and Federated Farmers in their submission.
4	14	Amend Policy 14-3 as requested by DairyNZ and Federated Farmers in their submission.
5	14	Amend Policy 14-5 as requested by DairyNZ and Federated Farmers in their submission.
6	14	Amend Policy 14-6 as requested by DairyNZ and Federated Farmers in their submission.
7	14	Amend Rule 14-1 as requested by DairyNZ and Federated Farmers in their submission.
8	14	Amend Rule 14-2 as requested by DairyNZ and Federated Farmers in their submission.
9	14	Amend Rule 14-2A as requested by DairyNZ and Federated Farmers in their submission.
10	14	Amend definitions as requested by DairyNZ and Federated Farmers in their submission.

Submitter Number: 53

Andrew Day

3
Pahiatua
4983

Summary of Decision(s) Requested for Submitter Number: 53

Statement#	Topic	Decision Requested
1	14	I support the framework of table 14.2 and the inherent transparent allocation of scarce resource across entire catchments. I support the need to include updates of overseer to accurately assess compliance with table 14.2 but I do not support these particular updated values in table 14.2 and particularly not as a region wide threshold value
2	GEN	I support good management practices within the values stated in table 14.2 but oppose these same practices when used to justify intensity of environmental impact beyond these levels.
3	GEN	I support the addition of a policy and rule stream to allow non-intensive land uses to opt in to the formal resource allocation framework (see pages 5-77, 5-78 of 2012 decisions from the Environment Court)
4	GEN	I support the introduction of a nutrient traceability policy and rule to help reduce the economic cost of PC2 (see pages 5-77, 5-78 of 2012 decisions from the Environment Court).
5	GEN	Following the actions of Council in granting restricted discretionary consents, I no longer consider this level of consent is adequate or sufficiently transparent and that all consents granted should be searchable by the public on a publicly available database.

Submitter Number: 54

**Environmental Defence Society
PO Box 91736**

**Auckland
1142**

Summary of Decision(s) Requested for Submitter Number: 54

Statement#	Topic	Decision Requested
1	GL	<p>-Reinsert reference to OVERSEER, update the definition to refer to the most recent Code of Practice for Nutrient Management (2017) and remove the additional wording proposed by PC2. -EDS has no issue with the deletion of the wording "both a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture and" from the definition.</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
2	5	<p>- Deletion of sub-clause (a)(iia) and deletion of "(iia) and" from sub-clause (a)(ii). -Insert "as a minimum" to the end of sub-clause (d)(i).</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
3	14	<p>Reinstate the pre PC2 wording with the inclusion of the underlined words: "The Regional Council will examine on an on going basis relevant industry based standards including good management practices" .</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
4	14	<p>-Deletion of sub-clause (d)(i) and (e). - Insert "as a minimum" to the end of sub-clause (b).</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
5	14	<p>-Revert sub-clause (b) in Matters of Control to pre-PC2 wording. -Amend sub-clause (i) in Matters of Control to read: "the matters in Objectives and Policies, particularly those in Chapter 5 and Chapter 14".</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
6	14	<p>-Amend Rule 14.2 to read: "Existing intensive farming land use activities not complying with any of the conditions, standards and terms (a), (b) and (d) to (j) of Rule 14.1". -Amend sub-clause (b) in Matters of Discretion to pre-PC2 to read: "measures, including good management practices, ..."</p> <p>-Amend sub-clause (l) in Matters of Discretion to read: "the matters in Objectives and Policies, particularly those in Chapter 5 and Chapter 14"</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
7	14	<p>-Amend intensive farming land use activities not complying with condition, standard, term (c) of Rule 14.1 to be non-complying. -Include a requirement for there to be public notification of the consent.</p> <p>Or any such similar, other, further and/or consequential relief to give effect to this submission.</p>
8	14	<p>EDS supports the changes to the LUC leaching limits in Table 14.2.</p>

Submitter Number: 55

**Wellington Fish & Game Council
PO Box 1325**

Palmerston North 4440

Summary of Decision(s) Requested for Submitter Number: 55

Statement#	Topic	Decision Requested
1	14	Wellington Fish and Game Council supports the changes to the LUC leaching limits in Table 14.2.
2	GL	<ul style="list-style-type: none">- Reinsert reference to OVERSEER, update the definition to refer to the most recent Code of Practice for Nutrient Management (2017) and remove the additional wording proposed by PC2.- Wellington Fish and Game Council has no issue with the deletion of the wording "both a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture and" from the definition.
3	5	<ul style="list-style-type: none">- Deletion of sub-clause (a)(ia) and deletion of "(ia) and" from subclause (a)(ii).- Insert "at a minimum" to the end of sub-clause (d)(i).
4	14	Reinstate the pre PC2 wording with the inclusion of the underlined words: "The Regional Council will examine on an on-going basis relevant industry based standards including good management practices ... "
5	14	<ul style="list-style-type: none">- Deletion of sub-clause (d)(i) and (e).- Insert "at a minimum" to the end of sub-clause (b).- If sub-clause (c) is retained, insert the additional words "farm system modelling, optimisation and marginal cost-marginal benefit analysis that determines the range of leaching reductions that are available"- Clarify the role of clause (f)(iii) in the hierarchy.
6	14	<ul style="list-style-type: none">- Revert sub-clause (b) in Matters of Control to pre-PC2 wording.- Amend sub-clause (i) in Matters of Control to read: "the matters in Objectives and Policies, particularly those in Chapter 5 and Chapter 14".
7	14	<ul style="list-style-type: none">- Amend Rule 14.2 to read: "Existing intensive farming land use activities not complying with any of the conditions, standards and terms (a), (b) and (d) to (j) of Rule 14.1".- Amend sub-clause (b) in Matters of Discretion to pre-PC2 to read: "measures, including good management, ... practices"- Amend sub-clause (i) in Matters of Discretion to read : "the matters in Objectives and Policies, particularly those in Chapter 5 and Chapter 14".
8	14	<ul style="list-style-type: none">- Amend intensive farming land use activities not complying with condition, standard, term (c) of Rule 14.1 to be non-complying.- Include a requirement for there to be public notification of the consent.- Incorporate the parent policy limit of 5 years on consent granted under this rule or if this has been incorrectly applied between the policy and the rule, a maximum time limit of 10 years.

Submitter Number: 56

BEL Group

Robert Barry, Sustainability Lead

Summary of Decision(s) Requested for Submitter Number: 56

Statement#	Topic	Decision Requested
1	14	We support the updated Table 14.2
2	GEN	We support DairyNZ and Federated Farmers in their submission.

Submitter Number: 57

**Woodhaven Gardens Ltd
44 Joblins Road
R D 1
Levin
5571**

Summary of Decision(s) Requested for Submitter Number: 57

Statement#	Topic	Decision Requested
1	14	<p>Inclusion of a new policy that establishes the framework for rules for Commercial Vegetable Growing [uses Environment Canterbury Land and Water Plan policy as a base; text between *** are proposed insertions and text between double square brackets is proposed to be deleted]:</p> <p>Recognise the particular constraints that apply to commercial vegetable growing operations (including the need to rotate crops to avoid soilborne diseases and for growing locations in close proximity to processing facilities) and provide a nutrient management framework that appropriately responds to and accommodates these constraints while improving or maintaining water quality by:</p> <ul style="list-style-type: none">a. requiring commercial vegetable growing operations to operate at good management practice;b. ***within the Water Management Sub Zones,*** restricting [[avoiding]] the establishment of [[a]] new commercial vegetable growing operation***s***, or any expansion of an existing commercial vegetable growing operation beyond the baseline commercial vegetable growing area, unless the nitrogen losses from the operation can be accommodated within the lawful nitrogen loss rate applicable to the new location***c. Recognising that if leased land is retired from commercial vegetable production to achieve nitrogen losses, any new activity on that land must be restricted to activities that produce no more than the average nitrogen loss figures for the catchment the land is located in***c. requiring commercial vegetable growing operations to demonstrate, at the time of application for resource consent and at the time of any Farm Environment Plan audit, how any relevant nutrient loss reduction will be achieved;d. constraining, as far as practicable, commercial vegetable growing operations to a single soil management zone or sub-region; ande. requiring a Nutrient Management Plan as part of any application for resource consent.
2	14	<p>Addition of a controlled activity pathway for existing Commercial Vegetable growing inside a WMSZ with a table specifying required Nitrogen Loss reductions for Commercial Vegetable growing if they are unable to meet Table 14.2. The starting position should be based on the enterprise baseline of total average Nitrogen Loss inside the WMZS 2017-2018.</p> <p>Rule: 14-1A Existing intensive farming land[^] use activities: Commercial Vegetable Growing</p> <p>Activity:</p> <p>The use of land[^] pursuant to s9(2) RMA for commercial vegetable growing* that was existing in the Water Management Sub-zones* as at April 2017 and as listed in Table 14.1 and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming:</p> <ul style="list-style-type: none">(a) the discharge[^] of fertiliser* onto or into land[^](b) the discharge[^] of grade Aa biosolids* or compost* onto or into production land[^] <p>and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA.</p> <p>Where the existing intensive farming land[^] use is located partly on land within one or more of the water management sub-zones* listed in Table 14.1 and partly on other land, this rule only applies:</p> <ul style="list-style-type: none">(a) if at least 20% of the existing intensive farming land[^] use is located on land within the listed water management sub-zones*; and(b) to the portion of the existing intensive farming land[^] use that is located within the listed water management sub-zones*. <p>Classification: Controlled</p> <p>Conditions / Standards / Terms:</p> <ul style="list-style-type: none">(a) A nutrient management plan* must be prepared for the land[^] and provided annually to the Regional Council.(b) The activity must be undertaken in accordance with the nutrient management plan* prepared under (a).(c) The nutrient management plan* prepared under (a) must demonstrate that either<ul style="list-style-type: none">(i) the nitrogen leaching loss from the activity will not exceed the cumulative nitrogen leaching maximum* specified in Table 14.2; or(ii) for activities that cannot meet Table 14.2, that the Nitrogen reduction limits in Table 14.3 are met.(d) The nitrogen reduction limits in Table 14.3 shall be based upon the total nitrogen loss of the business in the WMSZ based non the 2017/2018 rotation baseline.(e) Where the nitrogen losses in (c) or (d) above are achieved by divesting leased land, the future use of

that land shall be restricted to activities that produce no more than the average nitrogen loss per hectare for the catchment the land is located in.

(e) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.

(f) The discharge[^] of grade Aa biosolids* or compost* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-7.

Control / Discretion Non-Notification:

Control is reserved over:

- (a) the implementation of the nutrient management plan*
- (b) best management practices* to avoid, remedy or mitigate nutrient leaching and run-off, and sediment losses from the land[^],
- (c) the frequency of independent audits in accordance with the Horticulture NZ Environmental Management System;
- (d) the matters of control in Rule 14-11
- (e) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift
- (f) duration of consent for no less than 20 years
- (g) review of consent conditions[^]
- (h) compliance monitoring
- (i) the matters in Policies 14-5, 14-6 and 14-9.

Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons).

New Table 14.3:
Nitrogen Leaching Reduction Targets

Period (from year Rule has legal effect)	
0	
Year 5	15% reduction
Year 10	25% reduction
Year 20	36% reduction

[Note: consequential amendment to existing Rule 14-1 Activity also recorded as follows; text between double brackets proposed to be deleted.]

The use of land[^] pursuant to s9(2) RMA for any of the following types of intensive farming:

- (i) dairy farming*
- (ii) [[commercial vegetable growing]]
- (iii) cropping*
- (iv) intensive sheep and beef farming*

that was existing in the Water Management Sub-zones* listed in and from the dates specified in Table 14.1 .

3 GEN

The merging of PPC2 with PPC3 to provide for rules for consenting Land Use Change for Commercial Vegetable growing outside the WMSZ in accordance with Good Management Practice as demonstrated by independently audited compliance with the Horticulture New Zealand EMS.

[New rule proposed, as follows:]

Rule: 14-1D Intensive farming land[^] use activities: New Commercial Vegetable Growing activities outside WMSZ

Activity:

The use of land[^] pursuant to s9(2) RMA for a new commercial vegetable growing* activity on land located outside the Water Management Sub Zones and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming:

- (a) the discharge[^] of fertiliser* onto or into land[^]

and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA.

(c) Where the existing intensive farming land[^] use is located partly on land within one or more of the water management sub-zones* listed in Table 14.1 and partly on other land, this rule only applies:

- (d) [a] if at least 20% of the existing intensive farming land[^] use is located on land within the listed water management sub-zones*; and
- (e) [b] to the portion of the existing intensive farming land[^] use that is located within the listed water management sub-zones*.

(f)

[NOTE: Numbering is as shown in submission]

Classification: Controlled

Conditions / Standards / Terms:

(a) The activity must be independently audited by an appropriately qualified person to demonstrate that the activity is complying with Good Management Practices.

Control/Discretion Non-Notification:

Control is restricted to:

- (a) good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, and sediment losses from the land[^]
- (b) the matters of control in Rule 14-11
- (c) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift
- (e) duration of consent,
- (f) review of consent conditions[^]
- (g) compliance monitoring
- (i) the matters in Policies 14-5, 14-6 and 14-9.

Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons)

4 14

Addition of a restricted discretionary activity pathway for existing Commercial Vegetable growing inside the WMSZ that cannot meet table 14.2 and cannot meet the controlled activity pathway proposed in decision 1 required above to continue Commercial Vegetable growing at independently audited Best Management Practice.

Rule: 14-1B Intensive farming land[^] use activities: Commercial Vegetable Growing not complying with Standards c(i) or (ii) of Rule 14-1A

Activity:

The use of land[^] pursuant to s9(2) RMA for commercial vegetable growing* that was existing in the Water Management Sub-zones* as at April 2017 and as listed in in Table 14.1, and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming:

- (a) the discharge[^] of fertiliser* onto or into land[^]

and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA.

Where the existing intensive farming land[^] use is located partly on land within one or more of the water management sub-zones* listed in Table 14.1 and partly on other land, this rule only applies:

- (a) if at least 20% of the existing intensive farming land[^] use is located on land within the listed water management sub-zones*; and
- (b) to the portion of the existing intensive farming land[^] use that is located within the listed water management sub-zones*.

Classification: Restricted Discretionary

Conditions / Standards / Terms:

(a) The activity must be independently audited by an appropriately qualified person to demonstrate that the activity is complying with Best Management Practices.

Discretion / Control Non-Notification:

Discretion is reserved over:

- (a) best management practices* to avoid, remedy or mitigate nutrient leaching and run-off, and sediment losses from the land[^]
- (b) the matters of control in Rule 14-11
- (c) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift
- (e) duration of consent, up to a period of 10 years and
- (f) review of consent conditions[^]
- (g) compliance monitoring
- (i) the matters in Policies 14-5, 14-6 and 14-9.

Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons).

5 14

Addition of caps or small reductions required for Land Users below values on Table 14.2 to ensure N loss cannot increase eroding the value of cuts made by users exceeding Table 14.2.

6 14

Link the Rules to the land areas that existed as at 2017/2018 rotation, as this was the date that the industry learnt that the Council would not proceed with Good Management Practice. Prior to this date, growers made investment decisions for CVP activities as it was understood that GMP would be adopted by the Council.

7 14

Proposed new rule:

Rule: 14-1C Intensive farming land[^] use activities: Expansion of Commercial Vegetable Growing activities inside

Activity:

The use of land[^] pursuant to s9(2) RMA for the expansion of a commercial vegetable growing* activity that was existing in the Water Management Sub-zones* as at April 2017 and as listed in in Table 14.1, or new a commercial vegetable growing* activity, provided that the nitrogen losses from the operation can be accommodated within the lawful nitrogen loss rate applicable to the new location, and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming:

(a) the discharge[^] of fertiliser* onto or into land[^]

and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA.

(a) Where the existing intensive farming land[^] use is located partly on land within one or more of the water management sub-zones* listed in Table 14.1 and partly on other land, this rule only applies:

(b) (a) if at least 20% of the existing intensive farming land[^] use is located on land within the listed water management sub-zones*;

(c) (b) to the portion of the existing intensive farming land[^] use that is located within the listed water management sub-zones*.

Classification: Restricted Discretionary

Conditions / Standards / Terms:

(a) Activities in all areas must be independently audited by an appropriately qualified person to demonstrate that the activity is complying with Best Management Practices.

(b) A nutrient management plan* must be prepared for the land[^] and provided annually to the Regional Council.

(c) The activity must be undertaken in accordance with the nutrient management plan* prepared under (a).

(d) The nutrient management plan* prepared under (a) must demonstrate that either

(i) the nitrogen leaching loss from the activity will not exceed the cumulative nitrogen leaching maximum* specified in Table 14.2; or

(ii) for activities that cannot meet Table 14.2, that the Nitrogen reduction limits in Table 14.3 are met.

(e) The nitrogen reduction limits in Table 14.3 shall be based upon the total nitrogen discharge of the business.

(f) Nitrogen loss predictions from any leased land foregone by growers to meet Nitrogen loss reductions shall be limited to the average Nitrogen loss for the catchment based on the LUC of the leased land.

(g) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.

(h) The discharge[^] of grade Aa biosolids* or compost* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-7.

Control / Discretion Non-notification:

Discretion is retained over:

(a) best management practices to avoid, remedy or mitigate nutrient leaching and run-off, and sediment losses from the land[^]

(b) the matters of control in Rule 14-11

(c) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift

(e) duration of consent for no more than 10 years and

(f) review of consent conditions[^]

(g) compliance monitoring

(i) the matters in Policies 14-5, 14-6 and 14-9.

Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons).

Submitter Number: 58

Federated Farmers of New Zealand Inc
PO Box 945

Palmerston North
4440

Coralee Matena, Senior Policy Advisor

Summary of Decision(s) Requested for Submitter Number: 58

Statement#	Topic	Decision Requested
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1	5	
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Amend Policy 5-8:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Policy 5-8: Management and Rregulation of intensive farming land[^] use activities affecting groundwater and surface water[^] quality

In order to give effect to Policy 5-7, the effects of intensive farming land[^] use activities on groundwater and surface water[^] quality must be managed in the following manner:

(a) Nutrients

(i) ***Until 30 June 2023, *** Nitrogen leaching maximums must be established in the regional plan which:

(A) take into account all the non-point sources of nitrogen in the catchment

(B) will achieve the strategies for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6

(B) (C) recognise the productive capability of land[^] in the Water Management Sub-zone*

(C) (D) are achievable on most farms using good management practices*

(D) (E) provide for appropriate timeframes for achievement where large changes to management practices or high levels of investment are required to achieve the nitrogen leaching maximums.

(ii) ***Where consents are granted pursuant to (i), manage existing*** [[Existing]] intensive farming land[^] use activities [[must be regulated]] in targeted Water Management Sub-zones* to achieve the nitrogen leaching maximums specified in

(i) except as provided for in ***(iiaa),*** (iia) and (iib) below.

***((iiaa) Where consents are not granted pursuant to (i), manage existing intensive farming land use activities in targeted Water Management Sub-zones to ensure that the nitrogen leaching loss for the land does not exceed the lesser of (except as provided for in (iia) and (iib) below):

1. 90% of the land's nitrogen baseline*; or

2. The 75th percentile nitrogen leaching loss* ***

(iia) ***Manage existing*** [[Existing]] intensive land[^] use activities which do not comply with (ii) ***or (iiaa)*** [[must be regulated]] to reduce nitrogen leaching [[which is in excess of the nitrogen leaching maximums established under]]

(a) by implementing good management practice*, and***, where appropriate,*** additional measures to ***reduce nitrogen*** [[minimise the degree of non-compliance,]] having regard to:

(A) the feasibility, practicality, and cost of achieving the nitrogen leaching maximums specified in (i) ***or the reductions specified in (iiaa)***, and

((B) [[the strategy for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5,]] ***the need to maintain water quality where it meets the relevant Schedule E water quality targets and improve where it does not meet the relevant Schedule E water quality targets, and the strategy for groundwater quality in Policy 5-6, and the contribution of the particular activity to these targets or strategies.

(iib) Existing land[^] use activities which do not comply with (ii) ***or (iiaa)*** [[but are intended to transition to an alternative non-intensive farming land[^] use must]] ***may*** be regulated to [[ensure that they are able]] ***allow those activities*** to continue for a limited period of time ***provided that is for the purpose of*** [[in order to enable]] ***enabling*** that transition ***to an alternative non-intensive farming land use and provided*** [[and only where]] there is no increase in the exceedance of the nitrogen leaching maximums established under (a) ***or the baseline or nitrogen leaching loss specified in (iiaa).***

(iii) New intensive farming land[^] use activities must be regulated throughout the Region to achieve the nitrogen leaching maximums specified in (i).

(b) Faecal contamination

(i) Those persons carrying out existing intensive farming land[^] use activities in the targeted Water Management Sub-zones* listed in Table 14.1 or new conversions to intensive farming land[^] use activities anywhere in the Region must be required, amongst other things, to***, where practicable***:

(A) prevent cattle access to some surface water bodies[^] and their beds[^]

(B) mitigate faecal contamination of surface water[^] from other entry points (eg. race run-off)

(C) establish programmes for implementing any required changes.

(c) Sediment

(i) In those Water Management Sub-zones* where agricultural land[^] use activities are the predominant cause of elevated sediment levels in surface water[^], the Regional Council will promote the preparation of voluntary management plans under the Council's Sustainable Land Use Initiative or Whanganui Catchment Strategy for the purpose of reducing the risk of accelerated erosion*, as described in Chapter 4.

(d) Good management practices*

(i) All intensive farming land[^] use activities must [[be regulated to]] manage ***the associated*** nutrient leaching and run-off, faecal contamination, and sediment losses in accordance with good management practices*.

2	5	<p>In the event that there is scope to amend Table 14.2 as it applies to new intensive farming land, amend paragraph (a)(iii) to delete reference to nitrogen leaching maximums specified in (i) and to adopt a similar position or outcome as FFNZ's submission for existing intensive farming activities.</p>
3	5	<p>Amend Method 15-12:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Method 5-12 Innovative Land Use ***and N loss mitigation*** Research</p> <p>Description: Support initiatives by local communities, sector groups or tangata whenua which develop options for sustainable land use in the Region. Support for work in Water Management Sub-zones* where nitrogen leaching is an issue ***[refer Table 14.1]*** will be a priority in order to find ***financially and practically*** viable options ***[including N loss mitigation options]*** for intensive farming land users that will have difficulty in achieving the cumulative nitrogen leaching maximums* [[refer Table 14.1]] ***or making achieving reductions to the lesser of 90% of the land's nitrogen baseline or the 75th percentile nitrogen leaching loss.*** Horizons will provide assistance through providing data and information that will assist in the identification and evaluation of innovative ***N loss mitigations or*** land use options and participating in any evaluative work as appropriate.</p>
4	5	<p>Amend Method 5-13:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Method 5-13 Provision of information</p> <p>Description: Horizons will collate and publish information regarding***, and be responsive to,*** Overseer version changes and the identification and evaluation of nutrient management models other than Overseer that may be more appropriate for calculation of on-farm nutrient losses. ... Target: - ***To the extent that Table 14.2 continues to apply to farming activities,*** Horizons will ***update Table 14.2 in response to Overseer version changes*** [[consider whether it needs to respond to changes in Overseer]] through a plan change process ***[where necessary] and develop a methodology to provide for future updates without the need for continual plan changes.*** - A list of nutrient management models appropriate for use in intensive farming land is maintained on Horizons' website.</p>
5	14	<p>Retain as drafted. In the alternative, adopt a definition based on good farming practice that is consistent with the 2018 Good Farming Practice Action Plan (with necessary modifications so that it applies to this region).</p>
6	14	<p>FFNZ also seeks consequential amendments to Policy 14-3 in order to achieve a reasonable discretionary activity consenting pathway as explained below.</p>
7	14	<p>Amend Policy 14-5</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Policy 14-5: Management of intensive farming land^A uses In order to give effect to Policy 5-7 and Policy 5-8, intensive farming land^A use activities affecting groundwater and surface water^A quality must be managed in the following manner: (a) The following land uses have been identified as intensive farming land^A uses: (i) Dairy farming* (ii) Commercial vegetable growing* (iii) Cropping* (iv) Intensive sheep and beef* (b) The intensive farming land^A uses identified in (a) must be regulated where: (i) They are existing (ie., ***dairy farming established prior to 24 August 2010 and commercial vegetable growing, cropping and intensive sheep and beef established prior to 9 May 2013*** [[the Plan having legal effect]]) intensive farming land^A uses, in the targeted Water Management Sub-zones* identified in Table 14.1 [[3]]. (ii) They are new (ie., established after the ***dates referred to in paragraph (i) above*** [[Plan has legal effect4]]) intensive farming land^A uses, in all Water Management Sub-zones* in the Region. (c) ***Until 30 June 2023, nitrogen*** [[Nitrogen]] leaching maximums have been established in Table 14.2. (d) Except as provided for in Policy 14-6(d), Existing intensive farming land^A uses regulated in accordance with (b)(i) must be managed ***in the following manner:*** (ii) ***Until 30 June 2023, by ensuring*** [[to ensure]] that the leaching of nitrogen from those land^A uses does not</p>

exceed the cumulative nitrogen leaching maximum* values for each year contained in Table 14.2, unless the circumstances in Policy 14-6 apply; ***or

(iii) By ensuring that the nitrogen leaching loss for the land will not exceed the lesser of:

1. 90% of the land's nitrogen baseline; or
2. the 75th percentile nitrogen leaching loss for the relevant surface water management zone***

(e) New intensive farming land^ uses regulated in accordance with (b)(ii) must be managed to ensure that the leaching of nitrogen from those land^ uses does not exceed the cumulative nitrogen leaching maximum* values for each year contained in Table 14.2.

(f) Intensive farming land^ uses regulated in accordance with (b) must exclude cattle from:

(i) A wetland^ or lake^ that is a rare habitat*, threatened habitat* or at-risk habitat*.

(ii) Any river^ that is permanently flowing or has an active bed* width greater than 1 metre.

(g) All places where cattle cross a ***waterbody identified in paragraph (f)*** ~~[[river that is permanently flowing or has an active bed* width greater than 1 metre]]~~ must be culverted or bridged and those culverts or bridges must be used by cattle whenever they cross the ~~[[river]]~~ ***water body except when they are being actively supervised and actively driven across the river in one continuous movement and where the river crossing occurs no more than once per week.***

Footnotes:

[[3 The Plan has legal effect in the case of existing intensive farming land^ uses in these zones from the dates identified in Table 14.1.

4 The Plan has legal effect in the case of dairy farming* from 24 August 2010 and for commercial vegetable growing*, cropping* and intensive sheep and beef* it has legal effect from 9 May 2013.]]

8 14 In the event that there is scope to amend the provisions relating to new intensive farming land, amend paragraph (e) to achieve the same or similar outcome as FFNZ's proposal for existing intensive farming activities.

9 14 Amend Policy 14-6

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Policy 14-6: Resource consent decision-making for intensive farming land^ uses

When making decisions on resource consent^ applications, and setting consent conditions^, for intensive farming land^ uses the Regional Council must:

(a) Ensure the nitrogen leaching from the land^ is managed in accordance with Policy 14-5. (b) Ensure implementation of good management practices* to manage nutrient leaching and run-off, faecal contamination and sediment loss, as part of any intensive farming land^ use. An exception may be made to (a) for existing intensive farming land^ uses in the following circumstances:

(i) where the existing intensive farming land^ use occurs on land that has 50% or higher of LUC Classes IV to VIII and has an average annual rainfall of 1500 mm or greater; or

(ii) where the existing intensive farming land^ use cannot meet year 1 cumulative nitrogen leaching maximums* in year 1, they shall be managed through conditions on their resource consent to ensure year 1 cumulative nitrogen leaching maximums* are met within 4 years.

Where an exception is made to the cumulative nitrogen leaching maximum* the existing intensive farming land^ uses must be managed by consent conditions to ensure: (

(i) Good management practices to minimise the loss of nitrogen, phosphorus, faecal contamination and sediment are implemented.

(ii) Any losses of nitrogen, which cannot be minimised, are remedied or mitigated, including by other works or environmental compensation. Mitigation works may include but are not limited to, creation of wetland and riparian planted zones.

(c) Ensure that cattle are excluded from surface water in accordance with Policy 14-5 (f) and (g) except where landscape or geographical constraints make stock exclusion impractical and the effects of cattle stock movements ***are*** are ~~[[must be]]~~ avoided, remedied or mitigated. In all cases any unavoidable losses of nitrogen, phosphorus, faecal contamination and sediment ***that directly result from cattle not being excluded from surface water,*** are remedied or mitigated by other works or environmental compensation***, to the extent reasonably practicable.*** Mitigation works may include (but are not limited to) creation of wetland and riparian planted zones.

(d) Provide for exceptions to (a) for existing intensive farming land^ uses that exceed the ~~[[cumulative]]~~ nitrogen leaching ~~[[maximum*]]~~ ***rate specified in Policy 14-5(d)*** where:

(i) Good management practices* are implemented in accordance with a nutrient management plan*, along with additional ~~[[innovations and]]~~ measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land^ progressively over time; or

(ii) The existing intensive farming land^ use is to continue for no longer than five years ***from the date consent is issued*** in order to enable the transition to an alternative non-intensive farming land^ use without an increase in nutrient leaching and run-off, faecal contamination and sediment losses from the land^ over that period of time.

(e) When determining whether to enable an existing intensive farm land^ use to continue under (d)(i), have regard to:

(i) Whether the proposed ~~[[innovations and]]~~ ***mitigation*** measures represent the best practicable option^ to minimise the nutrient leaching and run-off, faecal contamination and sediment losses from the land^, having particular regard to ***~~(in addition to those matters set out in the definition of best practicable option in section 2 of the Act)***~~***.

(A) The extent of the exceedance of the ~~[[cumulative nitrogen leaching maximum* in Table 14.2]]~~ ***leaching rates specified in Policy 14-5(d);

(B) The rate of reduction of nitrogen loss towards the cumulative nitrogen leaching maximum* for any given year in

Table 14.2 leaching rates specified in Policy 14-5(d)***;
 (C) Whether further reductions are currently possible for the intensive farming land[^] use based on existing technologies ***and the associated cost and practicality of those technologies***.
 (ii) ***Until 2023, the*** [[The]] extent to which the non-compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 is attributable to updates in versions of OVERSEER ***and is not addressed by a methodology to allow for Table 14.2 to be updated with Overseer version change***;
 (iii) The nature and characteristics of the land[^], having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property;
 (iv) The contribution of the progressive reduction in nutrient leaching and run-off, faecal contamination and sediment losses from the land[^], over time, to the improvement of water[^] quality within that Water Management Sub-zone*;
 [(v) The strategy for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6.]
 (f) When determining whether to enable the existing intensive farming land[^] use to continue under (d)(ii), have regard to:
 (i) Measures implemented in accordance with a nutrient management plan* to ensure that nutrient leaching and run-off, faecal contamination and sediment losses from the land[^] do not increase over the duration of the resource consent[^];
 (ii) good management practices* proposed to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land[^];
 (iii) the nature, sequencing, measurability and enforceability of any steps proposed to transition out of the intensive farming land[^] use by the expiry of the resource consent[^].

10 GEN In addition, amend the relevant provisions to ensure that the entire regime is appropriately flexible and tailored (e.g. tailoring GMP actions to the particular farm, providing for amendment to NMPs, a risk based approach to compliance etc), whilst at the same time being enforceable and achieving the desired water quality outcomes. FFNZ seeks any necessary amendments to Plan Change 2 to achieve this e.g. to the definition of GMP and NMP as set out below.

11 14 Amend Table 14.1 Targeted water management sub-zones:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Catchment | Water Management Sub-zone* | Date ***by which consents must be lodged*** [[the Rules of the Plan have legal effect⁵ in relation to Rule 14-1]]

Mangapapa | Mangapapa Mana_9b | [[1 July 2014]] ***6 months after Plan Change 2 becomes operative***

Waikawa | Waikawa West_9a Manakau West_9b | [[1 July 2014]] ***6 months after PC2 becomes operative***

Other south-west catchments (Papaitonga) | Lake Papaitonga West_8 | [[1 July 2014]] ***6 months after Plan Change 2 becomes operative***

Mangatainoka | Upper Mangatainoka Mana_8a Middle Mangatainoka Mana_8b Lower Mangatainoka Mana_8c

Makakahi Mana_8d | [[1 July 2015]] ***12 months after Plan Change 2 becomes operative***

Other coastal lakes | Northern Manawatu Lakes West_6 Kaitoke Lakes West_4 Southern Wanganui Lakes West_5 | [[1 July 2015]] ***12 months after Plan Change 2 becomes operative***

Coastal Rangitikei | Coastal Rangitikei Rang_4 | [[1 July 2015]] ***12 months after Plan Change 2 becomes operative***

Lake Horowhenua | Lake Horowhenua Hoki_1a Hokio Hoki_1b | [[1 July 2015]] ***12 months after Plan Change 2 becomes operative***

Upper Manawatu above Hopelands | Upper Manawatu Mana_1a Mangatewainui Mana_1b Mangatoro Mana_1c

Weber-Tamaki Mana_2a Mangatera Mana_2b Upper Tamaki Mana_3 Upper Kumeti Mana_4 Tamaki-Hopelands

Mana_5a Lower Tamaki Mana_5b Lower Kumeti Mana_5c Oruakeretaki Mana_5d Raparapawai Mana_5e | [[1 July 2016]] ***18 months after Plan Change 2 becomes operative***

Manawatu above gorge | Hopelands-Tiraumea Mana_6 Upper Gorge Mana_9a Mangaatua Mana_9c | [[1 July 2016]] ***18 months after Plan Change 2 becomes operative***

FOOTNOTE: [[⁵ The Plan has legal effect in the case of dairy farming* from 24 August 2010 and for commercial vegetable growing*, cropping* and intensive sheep and beef* it has legal effect from 9 May 2013.]]

In the alternative, delete the third column in Table 14.1.

12 14

Amend Table 14.2:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Table 14.2 Cumulative nitrogen leaching maximum* by Land Use Capability Class* ***that apply to consent applications until 30 June 2023 and numbers below calculated in Overseer 6.3.??***

In the alternative, delete Table 14.2 and apply FFNZ's proposed controlled activity rule (i.e. the greater of a 10% reduction in N or reduce to 75th percentile) to existing intensive farming activities.

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Conditions / Standards / Terms:

- (a) A nutrient management plan* must be prepared for the land[^], and provided ~~[[annually]]~~ to the Regional Council ***at the time of any application, and thereafter as required by any consent condition.***
- (b) The activity must be undertaken generally in accordance with the nutrient management plan* prepared under (a) ***and any changes to the nutrient management plan* must be submitted to the Regional Council.***
- (c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss from the activity will not exceed:
- ***~~(i)~~*** the cumulative nitrogen leaching maximum* specified in Table 14.2***; or
- (ii) whichever is the lesser of:
1. 90% of the land's nitrogen baseline*; or
 2. the 75th percentile nitrogen leaching loss for the relevant surface water management zone*. Except that (i) above shall not apply to resource consent applications lodged after 30 June 2023; and***
- (d) Cattle must be excluded from:
- (i) wetlands[^] and lakes[^] that are a rare habitat* or threatened habitat*, and
 - (ii) the beds[^] of rivers[^] that are permanently flowing or have an active bed* width greater than 1 m.
- (e) Rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, that are crossed by cattle must be bridged or culverted, and the cattle must cross via that bridge or culvert, and run-off originating from the carriageway of the bridge or culvert must be discharged[^] onto or into land[^]***, except when the cattle are being actively supervised and actively driven across the river in one continuous movement and where the river crossing occurs no more than once per week.***
- (f) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.
- (g) The discharge[^] of contaminants[^] onto or into land[^] from:
- (i) the preparation, storage, use or transportation of stock feed on production land[^], or
 - (ii) the use of a feedpad*
- and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-6.
- (h) The discharge[^] of grade Aa biosolids* or compost* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-7.
- (i) The discharge[^] of poultry farm litter* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-9.
- (j) The discharge[^] of farm animal effluent* onto or into production land[^] including:
- (i) effluent from dairy sheds and feedpads*
 - (ii) effluent received from piggeries
 - (iii) sludge from farm effluent ponds
 - (iv) poultry farm effluent
- and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^], standards and terms of Rule 14-11.

Control/Discretion Non-Notification

- Control is reserved over: (a) the implementation of the nutrient management plan* (b) compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land[^]
- (c) management practices and measures to achieve either the cumulative nitrogen leaching maximum specified in Table 14.2 or the required reduction from any nitrogen baseline or the 75th percentile nitrogen leaching loss.
- (d) the matters of control in Rule 14-11
- (e) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift
- (f) provision of information including the nutrient management plan*
- (g) duration of consent
- (h) review of consent conditions[^]
- (i) compliance monitoring
- (j) the matters in Policyies 14-5, 14-6 and 14-9.
- Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons).

In the alternative, apply Overseer on a five year rolling average basis and prepare/amend the NMP on this basis

In the alternative, delete reference to Table 14.2

In the alternative, amend Rule 14-1 to apply to new as well as existing intensive farming activities

FOOTNOTE: 9 ***In respect of applications for consents prior to Plan Change 2, the*** ~~[[The]]~~ Plan has legal effect in the case of dairy farming* from 24 August 2010 and for commercial vegetable growing*, cropping* and intensive sheep and beef* it has legal effect from 9 May 2013. ***In respect of applications for consent after the notification of Plan Change 2, Table 14.2 has legal effect in the case of all intensive farming land use activities from the date Plan Change 2 becomes operative.***

In the alternative, apply Overseer on a five year rolling average basis and prepare/amend the NMP on this basis

In the alternative, delete reference to Table 14.2

In the alternative, amend Rule 14-1 to apply to new as well as existing intensive farming activities

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Conditions / Standards / Terms:

- (a) ***Except to the extent that consent is sought under this rule not to comply with this condition, a*** [[A]] nutrient management plan* must be prepared for the land[^], and provided [[annually]] to the Regional Council.
- (b) ***Except to the extent that consent is sought under this rule not to comply with this condition, the*** [[The]] activity must be undertaken ***generally*** in accordance with the nutrient management plan* prepared under (a). (c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss from the activity will not exceed:
 - (i) the cumulative nitrogen leaching maximum* for any year in Table 14.2***; or
 - (ii) whichever is the lesser of:
 - 1. 90% of the land's nitrogen baseline*; or
 - 2. the 75th percentile nitrogen leaching loss* for the relevant surface water management zone*.
 Except that (i) above shall not apply to resource consent applications lodged after 30 June 2023; and The following conditions, standards and terms also apply except to the extent that consent is sought under this rule not to comply with them:
- (d) Cattle must be excluded from:
 - (i) wetlands[^] and lakes[^] that are a rare habitat* or threatened habitat*, and
 - (ii) the beds[^] of rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, other than at any specific location where access is required for dairy cattle to cross the river[^] in which case (e) applies.
- (e) Rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, that are crossed by cattle must be bridged or culverted, and the cattle must cross via that bridge or culvert, and run-off originating from the carriageway of the bridge or culvert must be discharged[^] onto or into land[^] except when the cattle are being actively supervised and actively driven across the river in one continuous movement and where the river crossing occurs no more than once per week.
- (f) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.
- (g) The discharge[^] of contaminants[^] onto or into land[^] from:
 - (i) the preparation, storage, use or transportation of stock feed on production land[^], or
 - (ii) the use of a feedpad* and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-6.
- (h) The discharge[^] of grade Aa biosolids*, soil conditioners* or compost* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-7.
- (i) The discharge[^] of poultry farm litter* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-9.
- (j) The discharge[^] of farm animal effluent* onto or into production land[^] including:
 - (i) effluent from dairy sheds and feedpads*(ii) effluent received from piggeries
 - (iii) sludge from farm effluent ponds
 - (iv) poultry farm effluent
 and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^], standards and terms of Rule 14-11.***

15 14 In the alternative, amend Rule 14-2 so that it applies to new as well as existing farming activities

16 14 Amend Rule 14-2A:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Activity:

The use of land[^] pursuant to s9(2) RMA for any of the following intensive farming activities:

- (i) dairy farming*
 - (ii) commercial vegetable growing*
 - (iii) cropping*
 - (iv) intensive sheep and beef farming*
- that was existing in the Water Management Sub-zones* listed in and from the dates specified in Table 14.1, and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with intensive farming, that do not comply with conditions, standards and term (c) of Rule 14.1 or [[one or more of the conditions[^], standards and terms of]] Rule 14-2:
- [[(a) the discharge[^] of fertiliser* onto or into land[^]
 - (b) the discharge[^] of contaminants[^] onto or into land[^] from
 - (i) the preparation, storage, use or transportation of stock feed on production land[^]
 - (ii) the use of a feedpad*
 - (c) the discharge[^] of grade Aa biosolids* or compost* onto or into production land[^]
 - (d) the discharge[^] of poultry farm litter* onto or into production land[^]
 - (e) the discharge[^] of farm animal effluent* onto or into production land[^] (or upon expiry or surrender of any existing consent for that discharge[^]) including:
 - (i) effluent from dairy sheds and feedpads*

(ii) effluent received from piggeries
(iii) sludge from farm effluent ponds
(iv) poultry farm effluent
and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA.]]

- 17 14 In the alternative, apply this rule to new as well as existing activities.
- 18 14 Retain as drafted
- 19 GL Retain as drafted.
In the alternative, use the word "manage" in the sentence "minimise the effects of discharges to land and water" instead of "minimise" and "reasonably practicable" as opposed to practical:

Good management practices refers to evolving ~~[[practical]]~~ ^{***practicable***} measures and methods, including those established in industry-based standards, which are used at a sector or community ^{***or farm***} level to ~~[[minimise]]~~ ^{***manage***} the effects of discharges to land[^] and water[^].
In the alternative, reword the definition based on good farming practice principles, as tailored to the region and catchment.
- 20 GL Amend Glossary - nutrient management plan:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ^{***s} is underline to signify text sought to be added.]

Nutrient management plan means a plan prepared ~~[[annually]]~~ in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers' Research Association 2007) which records (including copies of the OVERSEERr input and output files of a recognised nutrient management model used to prepare the plan) and takes into account all sources of nutrients for intensive farming and identifies all current and relevant nutrient management practices and mitigations, and which is prepared by a person who has both a Certificate of Completion in Sustainable 51 Nutrient Management in New Zealand Agriculture and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University.
- 21 GL Insert new definition - nitrogen baseline:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ^{***s} is underline to signify text sought to be added.]

^{***}Nitrogen baseline means the discharge of nitrogen below the root zone, as modelled with Overseer, or equivalent model approved by the Chief Executive of Horizons Regional Council, for the period 1 July 2012 to 30 June 2013. If an updated version of Overseer is issued, the most recent version is to be used to recalculate the nitrogen baseline* using the same input data as used for the 1 July 2012 to 30 June 2013 period.^{***}

Make other amendments to provide for a process (either within Plan Change 2 or in a document outside the plan) for how a nitrogen baseline will be calculated if input data is missing
- 22 GL Insert new definition - 75th percentile nitrogen leaching loss:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ^{***s} is underline to signify text sought to be added.]

^{***}75th percentile nitrogen leaching loss means the 75th percentile value (units of kg N/ha/year) of all of the nitrogen baseline* values for dairy farming activities in the Surface Water Management Zone* as determined for each Surface Water Management Zone*. The 75th percentile nitrogen leaching loss* is recalculated each time the nitrogen baseline is updated following release of a new version of Overseer.^{***}

In the alternative, define the 75th percentile by reference to the nitrogen baselines for the relevant sectors e.g. commercial vegetable growing.

Submitter Number: 59

**Forest & Bird
PO Box 631**

**Wellington
6140
Tom Kay**

Summary of Decision(s) Requested for Submitter Number: 59

Statement#	Topic	Decision Requested
1	GEN	Refuse the entire plan change

Submitter Number: 60

**Tararua Growers Association
583 Okuku Road
4**

**Palmerston North
4474**

Terry Olsen, President

Summary of Decision(s) Requested for Submitter Number: 60

Statement#	Topic	Decision Requested
1	GEN	We propose a tailored approach for commercial vegetable production.
2	GEN	We support requiring all growers to operate at good environmental management practice.
3	GEN	We proposed provisions be added to enable existing areas of vegetable growing to move onto different land. This provision is required for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations where lease arrangements provide that opportunity.

Submitter Number: 61

**Director-General of Conservation
Private Bag 3072**

**Hamilton
3240**

RMA Shared Services, Department of

Summary of Decision(s) Requested for Submitter Number: 61

Statement#	Topic	Decision Requested
1	5	Delete proposed wording: "In order to give effect to Policy 5-7, the effects of intensive farming land use activities on groundwater and surface water must be managed in the following manner:"
2	14	Amend policy to provide direction on what degree of good management practice is necessary, and what level of nitrogen reduction is acceptable, and how costs are balanced with environmental outcomes; and Delete subclause (A)
	3	GL Delete subclause (iib); or Amend to clearly direct the process steps and timeframes for the implementation of this policy.
4	GEN	Amend Policy 14-6(b) to require implementation of the minimum level of good management practice required; and Insert wording as follows: "ensure implementation of good management practices to manage minimise nutrient leaching and run-off, faecal contamination and sediment loss, as part of any intensive farming land use"
5	GEN	Amend Policy 14-6(d)(i) to identify what percentage or quantum of reduction in the nitrogen exceedance is to be considered appropriate before granting consent; and Identify over what timeframe these reductions are required and what milestones need to be achieved within that timeframe.
6	GEN	Delete Policy 14-6(d)(ii); or Identify the appropriate mechanism by which the policy can guarantee the intensive land use is discontinued, or that a future consent would be declined if the transition did not occur.
7	GEN	Amend the provisions [14-6(e)] to provide better direction to plan users and guidance for decision makers when "having regard to" the matters listed in proposed policy 14-6 (e)(i) through (v) when considering whether or not to grant a resource consent application. Provide direction on how these matters make an intensive land use activity appropriate or not and how this is linked to a reduction in nutrient leaching; and Delete clause (iv).
8	GEN	Delete Policy 14-6(f); or Amend to clearly dictate the process/steps for the implementation of this policy.
9	GEN	Amend the definition of 'Good Management Practice' to better identify what constitutes good management practice.
10	GEN	Include minimum requirements for what good management practices are required within nutrient management plans or a farm environment plan and what the anticipated environmental outcomes are.
11	14	Amend the provisions to provide better direction to plan users and guidance for decision makers when `having regard to" the matters listed in proposed policy 14-6 (e)(i) through (v), and (f) (i) through (iii), when considering whether or not to grant a resource consent application. Provide direction on how these matters make an intensive land use activity appropriate or not and how this is linked to a reduction in nutrient leaching. Any other consequential amendments necessary to address the concerns raised in this submission.
12	GEN	Amend the provisions to provide greater direction for plan users and decision makers on what level of good management practice is required and what circumstances may trigger a higher level of management, and what must be achieved by particular timeframes over which the management practices are required as conditions of consent. Any other consequential amendments necessary to address the concerns raised in this submission.
13	GEN	Amend the policies to identify the what level of reduction in nutrient leaching must occur over what time period and ensure clarity on how this would inform both applications for and decisions on land use consents. Provide direction on what level of reduction over what time period is considered appropriate when considering whether to grant or decline a discretionary consent. Any other consequential amendments necessary to address the concerns raised in this submission.
14	GEN	Clarify and identify how Council will implement, monitor, and enforce a policy which directs an intensive land use activity to continue for no longer than five years. Any other consequential amendments necessary to address the concerns raised in this submission.

- | | | |
|----|-----|--|
| 15 | GEN | <p>Ensure that the proposed plan change does not further contribute to the degradation of the freshwater and biodiversity values of the coastal environment, coastal lakes, and wetlands in the Horizons region.</p> <p>Any other consequential amendments necessary to address the concerns raised in this submission.</p> |
| 16 | GEN | <p>Amend the proposed plan change to give effect to the Resource Management Act 1991, the National Policy Statement for Freshwater Management 2014, the New Zealand Coastal Policy Statement 2010 and the Horizons Regional Policy Statement.</p> <p>Any other consequential amendments necessary to address the concerns raised in this submission.</p> |
| 17 | GEN | <p>Either amend the definition of nutrient management plan to refer to the latest 2013 version of the Code of Practice for Nutrient Management, or make the 2007 version available to the public.</p> <p>Any other consequential amendments necessary to address the concerns raised in this submission.</p> |

Submitter Number: 62

**Muaūpoko Tribal Authority Inc
P O Box 1080**

**Levin
5540**

Summary of Decision(s) Requested for Submitter Number: 62

Statement#	Topic	Decision Requested
1	GEN	<p>We propose that the Lake Horowhenua catchment be removed from this Plan Change. We expect that Horizons will actively engage with Muaupoko and the Lake Horowhenua Trust to develop more workable and holistic solutions to the pollution of Lake Horowhenua. There is no way we can accept the Lake Horowhenua catchment be included in this Plan Change until there is a robust Treaty of Waitangi Settlement that addresses past grievances' but also provides solutions for catchment management going forward.</p>

Submitter Number: 63

**Ngā Waihua o Paerangi Trust
P O Box 195**

**Ohakune
4660
Erena Mikaere**

Summary of Decision(s) Requested for Submitter Number: 63

Statement#	Topic	Decision Requested
1	5	Amend the introductory clause to read: "In order to give effect to Policies 5-2, 5-3, 5-4, 5-5 and 5-6, the effects of intensive farming land use activities on groundwater and surface water quality must be managed in the following manner:"
2	5	Do not delete clause (B) of the operative policy. Retain the existing operative wording,
3	5	Retain the wording of the existing operative policy.
4	5	Delete reference to exceptions (iia) and (iib).
5	5	Delete new clause (a)(iia).
6	5	Delete new clause (a)(iib)
7	5	Delete new clause (d).
8	5	Include 'tangata whenua' in the 'who' row of method 5-12.
9	14	Delete the proposed changes to Policy 14-3 and retain the policy as in the operative One Plan.
10	14	Retain as proposed.
11	14	FOOTNOTE 1: Amend the foot note to read: "The Plan has legal effect in the case of existing intensive farming land~ uses from the date of notification of the One Plan.in 2007".
12	14	FOOTNOTE 2: Amend the foot note to read: "The Plan has legal effect in the case of existing intensive farming land~ uses from the date of notification of the One Plan. in 2007".
13	14	Retain the existing wording of the operative One Plan.
14	14	Amend the wording of proposed clause to read: Ensure implementation of good management practices* to manage nutrient [[leaching and]] run off, faecal contamination and sediment loss, as part of any intensive farming land use.
15	14	Retain the wording of clause (b) of operative policy 14-6, do not delete it as proposed by PC2. Add a new clause after (a): (aa) Resource consent applications for farms to exceed the nitrogen leaching maximum must not be granted, unless they meet the criteria in (b) and are managed in accordance with (e).
16	14	Retain the wording of clause (c) of operative policy 14-6, do not amend it as proposed by PC2.
17	14	Delete clause (d)(i). Retain clause (d)(ii).
18	14	Delete the proposed policy, or Reword the policy so that it is consistent with achieving the water quality objectives of the One Plan and provide clear direction to decision makers to ensure all practicable measures are taken to minimise loss of contaminants from intensive farming and that reductions in contaminants are consistent with the water quality strategy set out in the RPS, and consistent with the rate and scale of reductions required by Table 14.2, or Reword the policy as follows: "When determining whether to enable an existing intensive farm land use to continue under ^{***} (b) or ^{***} (d)(^{***} ; ^{***}), and ^{***} deciding what conditions (if any) to impose on any resource consent, decision makers must ensure ^{***} [[have regard to]]:

(i) [[Whether the proposed innovations and measures represent the best practicable option^A to minimise the nutrient leaching and run-off, faecal contamination and sediment losses from the land^A.:]]

[[A]] The extent of exceedance of the cumulative nitrogen leaching maximum* in Table 14.2 ***is minimised and.***

[[B]] The rate of reduction of nitrogen loss towards the cumulative nitrogen leaching maximum* for any given year in ***is of a scale commensurate with the scale of reduction required in Table 14.2.***

[[C]] ***nutrient leaching and run off, Faecal contamination and sediment losses from the land^A, are reduced to the greatest extent possible using*** [[Whether further reductions are]] currently ***available*** [[possible for the intensive farming land^A use based on existing]] technologies ***and management practices.***

(iv) The contribution of the progressive reduction in nutrient leaching and run-off, faecal contamination and sediment losses from the land, over time, to the improvement of water quality within that Water Management Sub-zone* ***is proportionate to the reduction required and the contribution of the land use to achieving***

[[v]] The strategy for surface water^A quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy: 5-6."

"When determining whether to enable an existing intensive farm land use to continue under ***b) or*** (d)(i***i***), and ***deciding what conditions (if any) to impose on any resource consent, decision makers*** have regard to:

(ii) The extent to which the noncompliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 is attributable to updates in versions of OVERSEER;

(iii) The nature and characteristics of the land^A, having regard to Physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property;

19 14

Delete the proposed policy.

20 14

NOTE: RELATES TO TABLE 14.1

Amend Table 14.1 to add a new row as follows:

Catchment: Whangaehu Catchment

Water Management Sub-zone: Upper Whangaehu Whau_1 a

Waitangi Whau_1 b

Tokiahuru Whau_1c

Middle Whangaehu Whau_2

Lower Whangaehu Whau_3a

Upper Makotuku Whau_3b

Lower Makotuku Whau_3c

Upper Mangawhero Whau_3d

Lower Mangawhero Whau_3e

Makara Whau_3f

Whangaehu Whau_4

Date the Rules of the Plan have legal effect in relation to Rule 14-1: 2021

21 14

Retain the original numbers in Table 14.2 and apply it to the catchments not in the Tararua District (ie those catchments on the western side of the Ruahine and Tararua Ranges)

In addition, retain the amendments to Table 14.2 but provide for the amended numbers in a new table that applies only to the catchments in the Tararua District, as set out in the relief sought for a new Table 14.2A below.

22 14

Provide for the amended numbers in Table 14.2 in a new Table 14.2A to apply only to those catchments in the Tararua District.

23 14

Retain matter of control (b) as in the operative One Plan.

		And
24	14	Insert new matter of control to address additional good management practices as set out in PC2. Regards Rule 14-1 matter of control (i)
25	14	Oppose to the extent that the content of policies 14-5 and 14-6 are not supported. Retain as proposed.
26	14	Retain as proposed.
27	14	[Related to deleted discretion (b) in PC2.] Delete as proposed.
28	14	[Relates to "old" discretion (c) renumbered "new" discretion (b).] See full submission for details. Retain the wording in the operative One Plan.
29	14	Insert reference to Policy 14-6 to the extent that Policy 14-6 remains as in the Operative Plan or includes changes as sought by this submission.
30	14	***(!)*** [[(m)]] the matters in ***Policies[[y]] 14-6 and*** 14-9. Amend the Classification column from 'discretionary' to 'non-complying'.
		Or
		Amend the classification column from 'discretionary' to 'prohibited'.
31	GL	Delete the definition of Good Management practices.
		Or
		Amend the definition of Good management practices to set out specific management practices or outcomes sought by management practices that will achieve measurable improvement in water quality and reduction in contaminant loss from the intensive farming activity.
32	GL	Retain the wording in the operative One Plan.

Submitter Number: 64
WITHDRAWN

Summary of Decision(s) Requested for Submitter Number: 64
Submission withdrawn

Submitter Number: 65

**Water Protection Society
129 Raukawa Road**

Palmerston North

Dr Chris Teo-Sherrell, Chairperson

Summary of Decision(s) Requested for Submitter Number: 65

Statement#	Topic	Decision Requested
1	5	<p>WPS supports this change: Policy 5-8: Management and Rregulation of intensive farming land^ use activities affecting groundwater and surface water^ quality</p>
2	5	<p>WPS supports this change: In order to give effect to Policy 5-7, the effects of intensive farming land^ use activities on groundwater and surface water^ quality must be managed in the following manner:</p>
3	5	<p>WPS requests insertion into Policy 5-8, at this position, a new clause (a) that states (a) All intensive farming land^ use activities must be regulated to manage nutrient leaching and run-off, faecal contamination, and sediment losses in accordance with good management practices*.</p>
4	5	<p>WPS requests Policy 5-8(a) be relabelled 5-8(b).</p>
5	5	<p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS requests slight adjustment of Policy 5-8(a)(i)(A) so that it states (A) take into account all the non-point ***and point*** sources of nitrogen ***contamination of ground and surface water*** in the catchment.'</p>
6	5	<p>WPS does not support deleting Policy 5-8(a)(i)(B).</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS requests that the original wording be altered to state: (B) will***, together with other aspects of this Policy,*** achieve the [[strategies]] ***goals*** for surface water^ quality set out in Policies [[5-2,]] 5-3***(a)***, 5-4***(a)*** and 5-5***(a)***, and the [[strategy]] ***goal*** for groundwater quality ***set out*** in Policy 5-6***(a)***.'</p>
7	5	<p>WPS does not support the change proposed to Policy 5-8(a)(i)(E).</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS requests the following wording be adopted : (E) provide for appropriate timeframes for ***leaching to be decreased sufficiently to achieve the nitrogen leaching maximums established under this Policy, if they are not already being met. The time allowed to meet the nitrogen leaching maximums will be determined by the practicality, complexity and cost of modifying farm practice to do so but in no case will exceed 10 years. Proposals for decreasing leaching to below the established maximums over more than 3 years will require milestones to be specified and achieved.'***</p>
8	5	<p>WPS supports making provision for exceptions to be made to the requirement for meeting the nitrogen leaching maximums by the years stated in Table 14-2. However, this support is only for a temporary failure to comply not a permanent one.</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS seeks replacement proposed clause 5-8(a)(ii) with 'Existing intensive farming land^ use activities must be regulated in targeted Water Management Sub-zones* to achieve the nitrogen leaching maximums [[specified]] ***established*** [[in]] ***under*** (i) ***within the timeframes established under (i)(E)*** except as provided for in (iia) and (iib) below'.</p>
9	5	<p>WPS supports in part insertion of clause (iia).</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS requests Policy 5-8(a)(iia) be replaced by (iia) Existing intensive ***farming*** land^ use activities which do not comply with [[(ii)]] ***the nitrogen leaching maximums established under (i) within 5 years*** must be regulated to reduce nitrogen leaching [[which is in excess of the nitrogen leaching maximums established under (a) by implementing good management practice*, and additional measures]] ***sufficiently to achieve the nitrogen leaching maximums within 10 years by implementing additional measures.'***</p>

10	5	<p>WPS supports in part insertion of Policy 5-8(a)(iib).</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS requests the specification of a time limit for transition so that the clause would read `Existing intensive farming land[^] use activities which do not comply with (ii) but are intended to transition to an alternative non-intensive farming land[^] use within 5 years must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition and only where there is no increase in the exceedance of the nitrogen leaching maximums established under [[a]].'</p>
11	5	<p>WPS requests the addition of the following clause after Policy 5-8(a)(iii)</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>***(iv) All existing intensive farming land use activities must comply with the nitrogen leaching maximums established under (i) within 10 years.</p> <p>For the avoidance of doubt, any existing intensive farming land use which does not comply with the nitrogen leaching maximums established under (i) within 10 years are prohibited activities. ***</p>
12	5	WPS requests Policy 5-8(b) be relabelled 5-8(c).
13	5	WPS requests that ` , amongst other things,' be deleted from Policy 5-8(b)(i).
14	5	<p>WPS requests that Policy 5-8(b)(i)(B) be replaced by `mitigate faecal contamination of surface water[^] from other entry points (eg., [[race]] run-off from races, stand-off pads and paddocks***)'</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p>
15	5	WPS requests 5-8(b)(i)(C) be deleted.
16	5	WPS requests Policy 5-8(c) be relabelled 5-8(d).
17	5	<p>WPS requests Policy 5-8(c)(i) be replaced by `In those Water Management Sub-zones* where agricultural land[^] use activities are the predominant cause of elevated sediment levels in surface water[^], the Regional Council will [[promote]] require the preparation and implementation of [[voluntary]] management plans under the Council's Sustainable Land Use Initiative or Whanganui Catchment Strategy for the purpose of reducing the risk of accelerated erosion*, as described in Chapter 4.'</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p>
18	5	<p>WPS supports in part insertion of this clause.</p> <p>WPS requests that Policy 5-8(d) be repositioned to near the top of this Policy and relabelled Policy 5-8(a).</p>
19	5	WPS supports the addition of Methods 5-12 and 5-13 to the Regional Policy Statement.
20	5	WPS supports the addition of Methods 5-12 and 5-13 to the Regional Policy Statement.
21	14	<p>The general intent of recognising the potnetial usefulness of certain practices is supported.</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Besides that we request the proposed wording be changed to `When making decisions on resource consent[^] applications, and setting consent conditions, for activities affecting groundwater and surface water[^] quality, the Regional Council must have regard to good management practices* and additional measures for decreasing nitrogen leaching [[to]] and the extent to which [[that]] those good management practices* and additional measures help give effect to Policies 5-1 to 5-8 [[address the matters in]] and Policies 14-1, 14-2, 14-4***, and 14-5 and 14-6.</p>
22	GL	<p>WPS requests a clearer definition of good management practices be given (in the glossary).</p> <p>WPS supports the intent of including a definition of Good management practices.</p> <p>WPS requests that a more definitive definition of Good management practices be proposed. A non-exclusive list of the types of practices meant by `good management practices' would also be helpful to make the meaning clearer, e.g. ***Good management practices include, but are not limited to,....***.'</p>

23	14	<p>WPS supports the intention of this insertion but opposes its location.</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>WPS requests Policy 14-5(b)(i) and (ii) be replaced by `i) They are existing ***(ie., established prior to the Plan having legal effect)*** intensive farming land[^] uses*, in the targeted Water Management Sub-zones*identified in Table 14.11. (ii) They are new ***(ie., established after the Plan has legal effect2)*** intensive farming land[^] uses*, in all Water Management Sub-zones* in the Region.'</p> <p>WPS also requests the deletion of the two footnotes.</p>
24	14	<p>WPS supports in part Policy 14-5(d).</p> <p>WPS requests that a reference to a further exception is added to Policy 14-5(d) as follows:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>(d) Except as provided for in Policy 14-6(d) ***and Policy 14-6(e) ***, [[E]]***e***xisting intensive farming land[^] uses regulated in accordance with (b)(i) must be managed to ensure that the leaching of nitrogen from those land[^] uses does not exceed the cumulative nitrogen leaching maximum* values for each year contained in Table 14.2,</p>
25	14	<p>WPS requests that Policy 14-5(f) be replaced by</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>`f) Intensive farming land[^] uses regulated in accordance with (b) must exclude cattle from: (i) ***within 20m from the mean annual highest water level of*** a wetland[^] or lake[^] that is a rare habitat*, threatened habitat* or at-risk habitat*. (ii) ***within 5m of the bed[^] of*** any river[^] that is permanently flowing ***(iii) within 5m of the active bed[^] of any river that is intermittently flowing and that has an active bed* width greater than 1 metre (iv) within 2.5m of the centreline of any other watercourse***</p>
26	14	<p>WPS supports the intent of proposed Policy 14-6(b)</p> <p>WPS requests that `as part of any intensive farming land[^] use' be deleted from it.</p>
27	14	<p>WPS requests that proposed Policy 14-6(c) be replaced by</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>`c) Ensure that cattle are excluded from surface water in accordance with Policy 14-5 (f) and (g) except where landscape or geographical constraints make stock exclusion impractical***.*** [[and the effects of cattle stock movements are must be avoided, remedied or mitigated.]] In all ***such*** cases***, the effects of*** any unavoidable losses of nitrogen,phosphorus, faecal contamination matter and sediment are must be avoided, remedied or mitigated by other works [[or environmental compensation]].'</p>
28	14	<p>WPS supports in part this insertion of Policy 14-6(d)(i)</p> <p>WPS requests Policy 14-6(d)(i) be replaced by</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>(d) Provide for exceptions to (a), ***for a period of 5 years,*** for existing intensive farming land uses that exceed the cumulative nitrogen leaching maximum***s*** where***.***</p> <p>(i) Good management practices* are ***being progressively*** implemented in accordance with a nutrient management plan*, [[along with additional innovations and measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land[^] progressively over time]]; or</p>
29	14	<p>WPS supports insertion of Policy 14-6(d)(ii).</p>
30	14	<p>WPS requests addition of the following clause to Policy 14-6:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>***(e) Provide for exceptions to (a), for a period of 10 years, for existing intensive farming land uses that do not</p>

comply with the cumulative nitrogen leaching maximums even with implementation of good management practices where:

(i) additional innovations and measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land^a are implemented progressively over time.^{***}

31 14 WPS requests that Policy 14-6(e) be relabelled Policy 14-6(f).

32 14 WPS requests that Policy 14-6(e) be replaced by

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ^{***}s is underline to signify text sought to be added.]

^{***}(f) When determining the timeframe (not to exceed 10 years) for an existing intensive farm land use to continue to exceed the nitrogen leaching maximums established under Policies 5-8(a) (as provided for by the exceptions described in by Policies 14-5(d), 14-6(d)(i) and 14-6(e)) have regard to:^{****}

33 14 WPS supports in part insertion of Policy 14-6(e)(i) to (v).

WPS requests 'strategy' be replaced by 'goals' on its first occurrence in (v) and by 'goal' on its second occurrence.

34 14 WPS requests that an additional point be added to this list in Policy 14-6(e) as follows:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ^{***}s is underline to signify text sought to be added.]

^{***}(vi) The nature, sequencing, measureability and enforceability of any steps proposed to decrease the leaching to below the maximums established under Policy 5-8(a).^{***}

35 14 WPS requests that Policy 14-6(f) be relabelled Policy 14-6(g).

36 14 WPS supports insertion of policy 14-6(f).

37 14 WPS requests that an additional clause is added to Policy 14.6 as follows:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ^{***}s is to signify text sought to be added.]

underline

^{***}(h) Not permit any intensive farming land use to continue to exceed the nitrogen leaching maximums for more than 10 years^{***}

38 14 WPS requests all such changes to the Rules as are necessary to give effect to the changes it has proposed above to PPC2.

39 GL WPS supports in part insertion of a definition of nutrient management plan.

WPS requests the phrase 'recognised' be replaced by 'Horizons-approved'.

40 GL WPS requests that the terms 'existing intensive farming land use' and 'new intensive farming land use' be defined here in the Glossary rather than as footnotes since the phrases are used many times in the One Plan and a reader shouldn't have to search for footnotes to find such definitions.

Possible definitions are as follows:

'Existing intensive farming land uses, in the targeted Water Management Sub-zones* identified in Table 14.1, are those intensive farming land uses which were being conducted prior to the dates listed in Table 14.1 for the Water Management Sub-zones* in which the land is located', and

'New intensive farming land uses, in all Water Management Sub-zones, are those which have been carried out only since 24 August 2010 in the case of dairy farming and only since 9 May 2013 in the case of commercial vegetable growing*, cropping* and intensive sheep and beef*.'

However, these two definitions are not mutually exclusive. An intensive dairy farm, for example, might have been set up in 2012 in the Makakahi (Mana_8d) Water Management Sub-zone. In that case it would be both a new and an existing intensive farming land use so there would be confusion as to which policies and rules apply. The definitions should be mutually exclusive but we leave that to the people who are paid to write these things to come up with suitable wording.

Submitter Number: 66

**Horticulture New Zealand
PO Box 10-232**

Wellington

Michelle Sands, Manager – Natural Resources & Environment

Summary of Decision(s) Requested for Submitter Number: 66

Statement#	Topic	Decision Requested
1	5	<p>Amend Policy 5-7: Land use activities affecting groundwater and surface water quality to include:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>***(bb) Recognise the particular domestic food production values associated with commercial vegetable growing and provide a tailored consenting pathway to manage associated effects groundwater and surface water.***</p>
2	5	<p>Amend Policy 5-8: Management and regulation of intensive farming land use, activities affecting groundwater and surface water quality, to exclude commercial vegetable growing.</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Policy 5-8: Management and Rregulation of intensive farming land[^] use, ***excluding commercial vegetable growing,*** activities affecting groundwater and surface water[^] quality In order to give effect to Policy 5-7, the effects of intensive farming land[^], ***excluding commercial vegetable growing***, use activities on groundwater and surface water[^] quality must be managed in the following manner:</p>
3	5	<p>Insertion of a new policy, 'Policy 5-8A Management and regulation of commercial vegetable growing, activities affecting groundwater and surface water quality', that provides for commercial vegetable growing.</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>***Policy 5-8A Management and regulation of commercial vegetable growing, activities affecting groundwater and surface water quality In order to give effect to Policy 5-7, the effects of commercial vegetable growing land use activities on groundwater and surface water quality must be managed in a manner that:</p> <ol style="list-style-type: none">1. Recognises the particular domestic food production values associated with commercial vegetable production and the need to keep pace with population growth and anticipated food supply requirements.2. Recognises the current difficulties in modelling on farm nutrient losses from commercial vegetable growing.3. Recognises the particular constraints that apply to commercial vegetable growing (including the need to rotate crops to avoid soil borne diseases and for growing locations in close proximity to processing facilities).4. Provides a nutrient management framework that appropriately responds to and accommodates these constraints while improving or maintaining water quality by:<ol style="list-style-type: none">a. Ensuring implementation of good management practices to manage nutrient leaching and run-off, faecal contamination and sediment loss.b. Managing commercial vegetable growing effects by land area controls.***
4	5	<p>Amend `Description' to apply to all land users, as shown in the track change amendments (Part D) and below:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Support initiatives by local communities, sector groups or tangata whenua which develop options for sustainable land use in the Region. Support for work in Water Management Subzones* where nitrogen leaching is an issue will be a priority in order to find viable options for [[intensive farming]] ***land users to make improvements to water quality to contribute to achieving water quality targets over-time.**** [[that will have difficulty in achieving the cumulative nitrogen leaching maximums* (refer Table 14.1).]]</p> <p>Amend `Links to Policy' to include reference to the new policy proposed, as shown in the track change amendments (Part D) and below: This method implements Policies 5-7 [[and]]***,*** 5-8 ***and Policy 5-8A***</p>

5 14

Retain, with consequential amendments:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

...the matters in Policies 14-1, 14-2, 14-4, ~~[[and]]~~ 14-5 ~~***and***~~ 14-6, ~~***and~~ 14-x~~***~~.

6 14

Insertion of a new policy, Policy 14-x Management of commercial vegetable growing activities, that provides for CVG.

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

***Policy 14-x Management of commercial vegetable growing activities

In order to give effect to Policy 5-7 and 5-8A, the effects of commercial vegetable growing (an intensive farming land[^] use) on groundwater and surface water quality must be managed in the following manner.

Provide for commercial vegetable growing including the flexibility to undertake crop rotations on changing parcels of land across sub-catchments and within Freshwater Management Units while requiring reductions in diffuse discharges from existing commercial vegetable growing and managing nitrogen, phosphorus, sediment and microbial pathogens for new commercial vegetable growing by:

- a. Enabling commercial vegetable growing that manages diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens within baselines and through adherence to Good Management Practice, Farm Environment Plans and risk-based Best Management Practice;
- b. Adopting sector-based initiatives and other mitigation measures to progressively reduce losses of nitrogen, phosphorus, sediment and microbial pathogens;
- c. Establishing baselines for each property or enterprise within a fresh water management unit that define:
 - i. The maximum area of land in commercial vegetable growing based on a representative sample of data from the five years prior to 2019, allowing for the maximum area in any one year over that period; and
 - ii. A commercial vegetable growing rotation.
- iii. Establishing commercial vegetable growing baseline that define the area associated with the existing rotations in the Water Management Sub-zones*
- d. Recognise the inter-regional domestic food supply values associated with commercial vegetable growing by provisioning a maximum area of land available to support commercial vegetable food supply needs for population growth during the anticipated life of the plan subject t controls to ensure:
 - i. The location is within the LUC I and II
 - ii. Increased area outside of Water Management Sub-zones* listed in Table 14.1
- e. Incentivise growers to reduce intensity within the Water Management Sub-zones* listed in Table 14.1 by enabling the equivalent expansion within the FMU, including through consent duration.
- f. Offsetting may be proposed for commercial vegetable growing activity above the maximum areas set out in c) and d), When assessing the effects of offset mitigation, consider improvements across one or more of the following contaminants: sediment, nutrient and bacteria, and the relationship of those attributes to long-term environmental, social and cultural outcomes sought in the receiving waters and any environmental, cultural and social benefits that result from the mitigation.***

7 14

Amend Policy 14-5: Management of intensive farming land uses, to exclude commercial vegetable production

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Policy 14-5: Management of intensive farming land[^] uses, ~~***excluding commercial vegetable growing***~~.

In order to give effect to Policy 5-7 and Policy 5-8, intensive farming land[^] use activities, ~~***excluding commercial vegetable growing,***~~ affecting groundwater and surface water[^] quality must be managed in the following manner:

(a) The following land uses have been identified as intensive farming land[^] uses:

- (i) Dairy farming*
- ~~[[~~(ii) Commercial vegetable growing*~~]]~~
- (iii) Cropping*
- (iv) Intensive sheep and beef*

8 14

Amend Policy 14-6: Resource consent decisionmaking for intensive farming land uses, to exclude commercial vegetable growing.

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Policy 14-6: Resource consent decision-making for intensive farming land[^] uses, ~~***excluding commercial vegetable growing***~~

When making decisions on resource consent[^] applications, and setting consent conditions[^], for intensive farming land[^] uses, ~~*** excluding commercial vegetable growing,***~~ the Regional Council must:

- 9 14 Amend Rule 14-1 Existing intensive farming land use activities to exclude commercial vegetable growing.
- [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]
- Rule:
14-1 Existing intensive farming land[^] use, activities ~~***~~excluding commercial vegetable growing,~~***~~
- Activity:
The use of land[^] pursuant to s9(2) RMA for any of the following types of intensive farming:
(a) dairy farming*
[[~~(b) commercial vegetable growing*~~]]
(c) cropping*
(d) intensive sheep and beef farming*
.
- 10 14 Amend Rule 14-2 Existing intensive farming land use activities, not complying with any of the conditions, standards and terms (a), (b) and (d) to (i) of Rule 14-1 to exclude commercial vegetable growing.
- [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]
- Rule:
14-2 Existing intensive farming land[^] use activities, ~~***~~excluding commercial vegetable growing~~***~~, not complying with any of the conditions, standards and terms (a), (b) and (d) to (i) of Rule 14-1
- Activity:
The use of land[^] pursuant to s9(2) RMA for any of the following intensive farming:
(i) dairy farming*
[[~~(ii) commercial vegetable growing*~~]]
(iii) cropping*
(iv) intensive sheep and beef farming*
...
- 11 14 Amend Rule 14-2A Existing intensive farming land[^] use activities excluding commercial vegetable production not complying with condition, standard, term (c) of Rule 14-1 or Rule 14-2, to exclude commercial vegetable growing.
- [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]
- Rule:
Rule 14-2A Existing intensive farming land[^] use activities ~~***~~excluding commercial vegetable growing~~***~~ not complying with condition, standard, term (c) of Rule 14-1 or Rule 14-2.
- Activity:
The use of land[^] pursuant to s9(2) RMA for any of the following intensive farming:
(i) dairy farming*
[[~~(ii) commercial vegetable growing*~~]]
(iii) cropping*
(iv) intensive sheep and beef farming*
- 12 14 Insert new rule, 14-2BX Existing Commercial vegetable growing.
- Rule:
~~***~~14-2BX Existing Commercial vegetable growing~~***~~
- Activity:
~~***~~The use of land[^] pursuant to s9(2) RMA for any commercial vegetable growing enterprise that was existing, on 22 July 2019 and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that CVG :
(a) the discharge[^] of fertiliser* onto or into land[^]
(b) the discharge[^] compost* onto or into production land[^]
(c) the discharge[^] of poultry farm litter* onto or into production land[^]
Where the commercial vegetable growing is located on land that is outside of the Water Management Subzones* listed in Table 14.1.~~***~~
- Classification:
~~***~~Permitted~~***~~
- Conditions / Standards / Terms:
~~***~~(a) A Farm Environment Plan demonstrates that the commercial vegetable growing enterprise meets Good Management Practice;
(b) The commercial vegetable growing enterprise area, as at 22 July 2019, can be located in FMU within the Region, but excludes any commercial vegetable growing area within Water Management Sub-zones* listed in Table 14.1

(c) Cattle must be excluded from:

- I. wetlands[^] and lakes[^] that are a rare habitat* or threatened habitat*, and
- II. the beds[^] of rivers[^] that are permanently flowing or have an active bed* width greater than 1 m.
- III. Rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, that are crossed by cattle must be bridged or culverted, and the cattle must cross via that bridge or culvert, and runoff originating from the carriageway of the bridge or culvert must be discharged[^] onto or into land[^].

(d) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.

(e) The discharge[^] of poultry farm litter* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-9.***

Insert new rule, 14-2CX Existing Commercial Vegetable growing not complying with the conditions, standards and terms of Rule14-2BX

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Rule:

14-2CX Existing Commercial Vegetable growing not complying with the conditions, standards and terms of Rule14-2BX***

Activity:

***The use of land[^] pursuant to s9(2) RMA for any commercial vegetable growing enterprise that was existing in the region on 22 July 2019, including commercial vegetable growing on land within the Water Management Sub-zones listed in Table 14.1*, and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that CVG:

- (g) the discharge[^] of fertiliser* onto or into land[^]
- (h) the discharge[^] compost* onto or into production land[^]
- (i) the discharge[^] of poultry farm litter* onto or into production land[^]****

Classification:

Controlled

Conditions / Standards / Terms:

- ***a) An audited Farm Environment Plan must be prepared for the commercial vegetable growing enterprise
- b) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.
 - c) The discharge[^] of poultry farm litter* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-9.
 - d) Cattle must be excluded from:
 - i. wetlands[^] and lakes[^] that are a rare habitat* or threatened habitat*, and
 - ii. the beds[^] of rivers[^] that are permanently flowing or have an active bed* width greater than 1 m.
 - iii. Rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, that are crossed by cattle must be bridged or culverted, and the cattle must cross via that bridge or culvert, and run-off originating from the carriageway of the bridge or culvert must be discharged[^] onto or into land[^].
 - e) The discharge[^] of fertiliser* onto or into land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-5.
 - f) The discharge[^] of poultry farm litter* onto or into production land[^] and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^] of Rule 14-9.
- And either:
- g) The Farm Environment Plan prepared under (a) can demonstrate that the nitrogen leaching loss from the commercial vegetable growing enterprise will not exceed the cumulative nitrogen leaching maximum* specified in Table 14.2; or
 - h) The commercial vegetable growing enterprise operates at the same area and intensity (as at 22 July 2019) and the FEP prepared under (a) can demonstrate that:
 - i. For land outside Water Management Sub-zones* listed in Table 14.1., Good Management Practice is achieved,
 - ii. For land within Water Management Sub-zones* listed in Table 14.1, Best Management Practice is achieved; or
 - i) The overall intensity of commercial vegetable growing enterprise is the same or lesser at the FMU scale, and:
 - i. For land outside water management zones, Good Management Practice is achieved,
 - ii. For land within Water Management Sub-zones* listed in Table 14.1,
 - i. Best Management Practice is achieved, and
 - ii. Where there is a reduction in intensity or area of commercial vegetable growing within water management sub-zones that is greater than the requirements of Best Management Practice, the equivalent area (at the intensity at 22 July 2019) can be transferred to land outside of outside of the Water Management Sub-zones* listed in Table 14.1., provided it is within FMU***

Control/Discretion Non-Notification:

Control is reserved over:

- (a) the implementation of the Farm Environment Plan demonstrates Good Management Practice, for land outside Water Management Sub-zones* listed in Table 14.1. and Best Management Practice for land for land within the Water Management Subzones* listed in Table 14.1.
 - (b) crop rotation intensity at the FMU scale
 - (c) commercial vegetable growing location and area annually
 - (d) time frames for actions within Farm Environment Plan
 - (e) good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land[^]
 - (f) avoiding, remedying or mitigating the effects of odour, dust or fertiliser* drift
 - (g) the matters referred to in the conditions[^] of Rules 14-5, 14-7 and 14-9
 - (h) duration of consent
 - (i) review of consent conditions[^]
 - (j) compliance monitoring
- Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons). ***

14 14

Insert new rule, 14-2DX New Commercial Vegetable growing

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Rule:

14-2DX New Commercial Vegetable growing

Activity:

***The use of land[^] pursuant to s9(2) RMA for any commercial vegetable growing enterprise and any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming:

- (a) the discharge[^] of fertiliser* onto or into land[^]
- (b) the discharge[^] compost* onto or into production land[^]
- (c) the discharge[^] of poultry farm litter* onto or into production land[^]

Where the CVG was not existing on 22 July 2019 and is located in any FMU in the region.***

Classification:

Restricted Discretionary

Conditions / Standards / Terms:

***a) An audited Farm Environment Plan demonstrates that the commercial vegetable growing enterprise meets Good Management Practice, for land outside Water Management Sub-zones* listed in Table 14.1. and Best Management Practice for land for land within the Water Management Sub-zones* listed in Table 14.1.

(b) The cumulative new commercial vegetable growing area in the Region is not greater than the area of commercial vegetable growing at 22 July 2019
+10% 3

(c) New commercial vegetable growing enterprise can move anywhere within the FMU, but the cumulative commercial vegetable growing area in the Water Management Sub-zones* listed in Table 14.1, cannot exceed what was existing within the Water Management Sub-zones* listed in Table 14.1 at 22 July 2019

(d) Cattle must be excluded from: i. wetlands[^] and lakes[^] that are a rare habitat* or threatened habitat*, and ii. the beds[^] of rivers[^] that are permanently flowing or have an active bed* width greater than 1 m.
iii. Rivers[^] that are permanently flowing or have an active bed* width greater than 1 m, that are crossed by cattle must be bridged or culverted, and the cattle must cross via that bridge or culvert, and run-off originating from the carriageway of the bridge or culvert must be discharged[^] onto or into land[^].***

Control/Discretion Non-notification:

***(a) the implementation of the Farm Environment Plan demonstrates Good Management Practice, for land outside Water Management Sub-zones* listed in Table 14.1. and Best Management Practice for land for land within the Water Management Subzones* listed in Table 14.1.

- (a) crop rotation intensity at the FMU scale
- (b) commercial vegetable growing location and land area annually
- (c) time frames for actions within Farm Environment Plan
- (d) good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal

contamination and sediment losses
from the land[^]
(e) avoiding, remedying or mitigating the
effects of odour, dust or fertiliser*
drift
(f) the matters referred to in the
conditions[^] of Rules 14-5, 14-7 and
14-9
(g) duration of consent
(h) review of consent conditions[^]
(i) compliance monitoring
Resource consent[^] applications under this
rule[^] will not be notified and written
approval of affected persons will not be required (notice of applications need not be
served[^] on affected persons).***

Footnote:

***3 is calculated based on predicted population growth between 2019 and 2029 (assumed life of the plan). If another
baseline date was selected, this area expansion would need to be adjusted.***

15 14 Insert new rule, 14-2EX Commercial Vegetable growing not complying with any of the conditions, standards and of
Rules 14-2CX or 14-2DX.

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is
underline to signify text sought to be added.]

Rule:

***14-2EX

Commercial Vegetable growing not complying with any of the conditions, standards and of Rules 14-2CX or
14-2DX.***

Activity:

***The use of land[^] pursuant to s9(2) RMA for any commercial vegetable growing enterprise and any of the following
discharges[^] pursuant to ss15(1) or

15(2A) RMA associated with that intensive farming:

(a) the discharge[^] of fertiliser* onto or into land[^]

(b) the discharge[^] compost* onto or into production land[^]

(c) the discharge[^] of poultry farm litter* onto or into production land[^]

That does not meet the conditions in Rules 14-2CX or 14-2DX.***

Classification:

Discretionary

16 GL Amend the definition of commercial vegetable growing:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is
underline to signify text sought to be added.]

Commercial vegetable growing means using an area of land greater than 4 ha for ~~[[producing]]~~ ***commercial
production of*** vegetable crops for human consumption***, on a horticultural farm***. It includes the whole rotational
cycle, being the period of time that is required for the full sequence of crops, including any pasture phase in the,
rotation. Fruit crops vegetables that are perennial, dry field peas or beans ***and other low intensity horticultural
crops*** are not included.

17 GL Include a definition for enterprise:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is
underline to signify text sought to be added.]

***Enterprise means one or more parcels of land held in single or multiple ownership to support the principle land
use, or land on which the principle land use is reliant, which constitutes a single operating unit for the purposes of
management***

18 GL Include a definition for farm:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is
underline to signify text sought to be added.]

***Farm means a property, area of land, or enterprise used for pastoral farming, horticultural farming, arable farming,
or mixed farming, other than a farm engaged in intensive indoor primary production***

Include a definition for horticultural farming:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Horticultural farming means farming where the predominant activity is growing food or beverage crops for human consumption (other than arable crops), or flowers for commercial supply

Hayden Turoa

Summary of Decision(s) Requested for Submitter Number: 67

Statement#	Topic	Decision Requested
1	GEN	Refuse the entire plan change
2	5	<p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>1. The proposed deletion of Policy 5-8(a)(i)(B) will result in Policy 5-8 no longer giving effect to Policy 5-7 which clearly states that the management of land use activities affecting groundwater and surface water must give effect to the strategy for surface water quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6, by managing diffuse discharges of contaminants, in the manner specified by that Policy. The relief sought is the operative Policy 5-8(a)(i)(B) is retained without changes.</p> <p>A. Also see below commentary regarding the reference to the strategies on proposed Policy 5-8(a)(ii)(B), operative Policy 14-4 and proposed Policy 14-6(e)(v)</p> <p>2. The proposed deletion of Policy 5-8(a)(i)(B) will result in Policy 5-8 no longer implementing RPS Objective 2-1, Objective 5-1 and Objective 5-2. The relief sought is the operative Policy 5-8(a)(i)(B) is retained without changes.</p> <p>3. In Policy 5-8(a)(ii) it is unclear by how much nitrogen leaching needs to be reduced in order to minimize the degree of non-compliance, this wording should be amended to read as <u>****significantly reduce****</u> so as to make this clear.</p> <p>4. In Policy 5-8(a)(ii) it is unclear what "[[additional matters]]" are supposed to be, and this is not defined, therefore it is recommended that the wording be deleted. The proposed definition of GMP uses the terminology "practical measures and methods".</p> <p>5. In Policy 5-8(a)(ii) use of the work "[[degree]]" should be replaced with <u>****extent****</u> to be consistent with later use of the word in Policy 14-6.</p> <p>6. In Policy 5-8(a)(ii)(A) reference to the "cost of achieving the nitrogen leaching maximums". infers that the maximum values are met, which is unclear in the context of a policy which anticipates that the values are exceeded. The recommended wording change to read <u>****financial implications***</u> [[cost]] <u>***of achieving the nitrogen leaching maximums specified in (i), were they to be achieved****</u>, better aligns with the RMA definition of best practicable option.</p> <p>7. In Policy 5-8(a)(ii)(B) reference to the strategy for groundwater and surface water quality is further justification for that reference to be retained in Policy 5-8(a)(i)(B).</p> <p>8. Policy 5-8(a)(iib) effectively grandfathers existing exceedances of the maxima in Table 14.2 during the transitional period and is an unfair approach to those consent holders whom undertake immediate action to reduce nitrogen leaching within the same 5-year period. Grandparenting is contrary to best practice. It is recommended that the wording is amended to read</p> <p>"(iib) Existing land[^] use activities which do not comply with (ii) but <u>***can demonstrate a***</u> [[are intended to]] transition to an alternative non-intensive farming land[^] use must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition. <u>***For the avoidance of doubt subclause (ii) applies to transition farms. [[and only where there is no increase in the exceedance of the nitrogen leaching maximums established under (a)]]</u>." so as to avoid grandparenting over the transitional period.</p> <p>[Note: Submitter provides tracked changes version of full Policy 5-8 in submission.]</p> <p>9. The proposed wording of Method 5-12 does not integrate the needs of tangata whenua, and fails to place Te Ao Maori at the centre of the research.</p> <p>10. Recommend that the wording is amended to read "Support initiatives by local communities, [[and]] sector groups [[or]] in consultation with tangata whenua which develop options for sustainable land use in the Region".</p> <p>11. Recommend that the wording is amended to read "Local communities <u>***including tangata whenua,***</u> rural and other sector groups, Territorial Authorities, Regional Council."</p>
3	5	<p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p>

12. Recommend that the wording is amended to read "Advice and assistance is available for landowners ~~and~~ tangata whenua in the Region regarding land use management practices."
- [Note: Submitter provides tracked changes version of full Method 5-12 in submission.]
- 4 5 [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ~~and~~ is underline to signify text sought to be added.]
13. The proposed working of Method 5-13 does not integrate the needs of tangata whenua, and promote the provision of information to tangata whenua.
14. Information produced under Method 5-13 should be provided to tangata whenua as part of the arrangements set out in RPS Chapter 2. Wording has been proposed "Horizons will serve copies of all reports published under this method to tangata whenua within the rohe to which the research applies."~~****~~
15. It is recommended that the wording be amended to read "Regional Council, ~~and~~ tangata whenua, rural sector, groups and nutrient management model providers."
- [Note: Submitter provides tracked changes version of full Method 5-13 in submission.]
- 5 14 [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ~~and~~ is underline to signify text sought to be added.]
19. It is proposed that all proposed changes to operative Policy 14-3 are rejected.
20. It is proposed that the only change to the operative Policy is to insert the wording "good management practices", " is inserted into Operative Policy 14-3 to read: "The Regional Council will examine on an on-going basis relevant industry-based standards (including good management practices* guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5."
- Note: Submitter provides tracked changes version of full Policy 14-3 in submission.
- 6 14 21. In Policy 14-5(b)(i), the introduction of new Footnote 1 creates an unclear situation whether an intensive farming land use that was converted after 24 August 2010 (dairy farming) or after 9 May 2013 (commercial vegetable growing, cropping and intensive sheep and beef) but before the dates listed in Table 14.1, is to be considered as 'new' or 'existing' for the purpose of the plan provisions. It is recommended that the new footnote be deleted.
22. The retention of the wording "affecting groundwater and surface water^ quality" in proposed Policy 14-5 is further justification for Policy 5-8(a)(i)(B) to be retained.
- [Note: Submitter provides tracked changes version of full Policy 14-5 in submission.]
- 7 14 [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ~~and~~ is underline to signify text sought to be added.]
23. Policy 14-6(b) should be amended to replace the word '[manage]' with ~~'manage'~~ "minimise" in relation to nutrient leaching and run-off.
24. There is a formatting error where operative Policy 14-6(c) has been deleted. In the notified version of the plan wording, the new policy 14-6(c) beginning "Ensure that cattle are excluded." is actually operative Policy 14-6(d). This error is inconsequential but it is unclear what has been amended.
25. In proposed policy 14-6(d)(i) it is unclear what constitutes "additional innovations and measures" or why they are required in addition to GMP to further reduce nutrient leaching. This wording should be deleted. The proposed definition of GMP uses the term "practical measures and methods".
26. In proposed policy 14-6(d)(i) it is unclear what time frame is intended with the use of wording "progressively over time". The wording "and to not exceed the cumulative nitrogen leaching maximum* for Year-20 in Table 14.2" should be inserted.
27. In proposed Policy 14-6(d)(ii) there is no restriction on the ability of a consent holder to reapply for a replacement consent upon expiry of the transition consent. The wording "or to 31 December 2025 (which ever comes first)" should be inserted, which aligns with the NPS Freshwater Management 2014.
28. In proposed Policy 14-6(e)(i) the wording "proposed innovations and measures represent" is undefined and should be replaced with "proposal represents". It is also unclear from the policy whether the BPO must be required for a proposal to be eligible for an exemption under (d)(i).
29. In proposed Policy 14-6(e)(i), use of the wording "having particular regard to" places a higher importance on

those listed matters compared to whether the proposal is the BPO, which is defined in the Act and does not consider those matters in (A) - (C). If an applicant were to present an assessment of the BPO, that would likely cover of those matters identified in (A)-(C) and therefore their prioritisation is unnecessary and unhelpful.

30. In proposed Policy 14-6(e)(i)(A), consideration of the extent of the exceedance is unhelpful when considering how much of an exceedance is appropriate, and this is also not an effects-based test. It is recommended that this be clarified as to what extent is acceptable and unacceptable.

31. In proposed Policy 14-6(e)(i)(B), it is important to consider both the quantity and the rate of reduction. It is proposed that the wording be amended to read "(B) The proportion and rate of reduction of nitrogen loss...".

32. In proposed Policy 14-6(e)(i)(C), it is unclear what aspects the 'further reductions' are targeting. It is recommended that the wording be inserted "further reductions ***in nutrient leaching and run-off, faecal contamination and sediment losses from the land*** are currently possible."

33. In proposed Policy 14-6(e)(ii), the reference to future versions of OVERSEER is ultra vires and contrary to caselaw that documents incorporated by reference cannot include 'subsequent versions or revisions', and any rule in a plan that purports to do so is ultra vires (Telecom New Zealand Limited v Christchurch City Council [2003] NZRMA 280). This clause (ii) should be deleted.

34. Under Policy 14-6(e), the decision maker is required to have regard to the matters listed in (i) through (v). Clause (i) contains three matters which are to be given particular regard. While considering clause (iii), additional matters are introduced in that clause ((iii)). Therefore, it is recommended that the word 'particular' is inserted before the word regard.

35. In proposed Policy 14-6(e)(iv), the wording ", over time," adds little value as it is inferred by the word progressive and should be deleted. The word 'demonstrated' should be inserted to read "The contribution of the progressive reduction in nutrient leaching and run-off, faecal contamination and sediment losses from the land^ to the demonstrated improvement of water^ quality within that Water Management Sub-zone*."

36. In proposed Policy 14-6(e)(v), reference to the ground- and surface water quality strategies in the RPS policies is further justification for the retention of Policy 5-8(a)(i)(B).

37. Proposed Policy 14-6 does not provide any regard for wetlands or lakes that are a rare habitat or threatened habitat. Policy 14-6 should be amended to include "(e)(vi) The presence of wetlands^ or lakes^ that are a rare habitat* or threatened habitat*."

38. Proposed Policy 14-6(f)(i) use of the word 'measures' should be amended to 'good management practices*', as measures is not defined in this context.

39. Proposed Policy 14-6(f)(i) should be amended to read "[[do not increase]] ***significantly decrease****", to be consistent with the sought changes to Policy 5-8(a)(iia).

40. Proposed Policy 14-6(f)(ii) should be amended to include the wording "adverse effects caused by".

41. Proposed Policy 14-6(f)(ii) should be amended to read "The nature, sequencing, measurability and enforceability of ***the programme of deintensification committed in order to*** [[any steps proposed to]] transition out of the intensive farming land^ use by the expiry of the resource consent^****, or before 31 December 2025 (whichever comes first) ****"

This approach is more transparent and enforceable, and the timeframe is consistent with NPS Freshwater Management 2014.

[Note: Submitter provides tracked changes version of full Policy 14-6 in submission.]

8 GEN

42. Operative Table 14.1 is created by Policy 14-5(b)(i), and in turn Policy 14-5 gives effect to RPS and Policy 5-8. Plan Change 2 (as notified) includes changes to both Policy 5-8 and Policy 14-5(b)(i). The proposed Table 14.1, in its version included in the notified plan change, no longer give effect to Policy 14-5(b)(i) or Policy 5-8 and therefore must be amended based on most recent science.

Submitter seeks addition of four new Water Management Sub-zones to Table 14.1: Middle Manawatu Mana_10, Lower Manawatu Mana_11, Oroua Mana_12, and Coastal Manawatu Mana_13.

[Note: Submitter provides tracked changes version of full Table 14.1 in submission.]

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43. The effects of the proposed changes on environmental and cultural values in the coastal lakes of the Horowhenua and Rangitikei have not been assessed by the Regional Council. The relief sought is that Regional Council provides an assessment on the expected loads entering those water bodies as a result of the proposed changes to the Table 14.2.

44. The relief sought is that the Regional Council amend Policy 14-5 to include a clause specifying the timing, trigger and method for review of Table 14.2, and Policy 14-6(e)(ii) is deleted. Note that plan review policies are also present in Chapter 12.

10	14	<p>45. Demonstration of compliance with the cumulative nitrogen leaching maximum specified in Table 14.2 is a Condition/Standard/Term of Rule 14-1. Therefore, it is appropriate to retain the original wording of matter of control (b).</p> <p>46. It is recommended that the original wording be reinstated "compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2" as matter of control (b).</p> <p>47. It is recommended that the new proposed wording be introduced as a new matter, either noted as (ba) or (j) "good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land^.</p> <p>48. In proposed Rule 14-1, the reference to Policy 14-6 is unnecessary and should be removed.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-1 in submission.]</p>
11	14	<p>52. It is recommended that the rule wording be amended to read "Existing intensive farming land^ use activities not complying with any of the conditions, standards and terms [(a), (b) and] (d) to (i) of Rule 14-1", and that the new Conditions/Standards/Terms (a), (b) and (c) of Rule 14-2 be retained.</p> <p>53. In Rule 14-2, the proposed deletion of the matter of discretion (b) is accepted as an exceedance of the CNLM cannot occur under proposed Rule 14-2.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-2 in submission.]</p>
12	14	<p>54. Amending Rule 14-2A to capture non-compliance with Conditions/Standards/Terms (a), (b) and (c) of Rule 14-1 would complement the changes to Rule 14-2 which captures Conditions (d) to (j) of Rule 14-1. This approach is simpler than the amendments proposed.</p> <p>55. In the case of Rule 14-2A, the context for a resource consent is one in which the demonstrated benefits of meeting the cumulative nitrogen leaching maximums is not achieved, and there is the potential for significant adverse effects on the environment. Given the strong policy direction (from Policy 5-7, 5-8, 14-5 and 14-6) to regulate excessive nutrient loss from land uses, a non-complying activity status is appropriate with the s104D threshold tests that require the adverse effects on the environment are not more than minor, or the application is not contrary to the objectives and policies of the Plan. The application of these tests is entirely appropriate in an environment that is facing significant stressors. This approach is consistent with the Quality Planning note on activity status.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-2A in submission.]</p>
13	GL	<p>58. The relief sought is:</p> <p>A. 1) A new Schedule K (titled 'Good management practices') to the Regional Plan is introduced which lists 'on-farm practical measures and methods' which can be considered to be GMP under Rules 14-1, 14-2 and 14-2A; and</p> <p>B. 2) Operative Policy 14-3 is amended to read: "The Regional Council will examine on an on-going basis relevant industry-based standards (including good management practices* guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5."</p> <p>[Note: Submitter provides tracked changes version of full Policy 14-3 in submission.]</p>
14	GL	<p>61. The relief sought is that the definition of NMP, and all references to NMP within the One Plan are replaced with "Farm Environment Plan", and new criteria are developed to specify the informational requirements of that FEP.</p>

Submitter Number: 68

Te Roopū Taiao o Ngāti Whakare Trust
P O Box 21

Shannon

Robert Ketu

Summary of Decision(s) Requested for Submitter Number: 68

Statement#	Topic	Decision Requested
1	GEN	Refuse entire plan change
2	5	<p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>1. The proposed deletion of Policy 5-8(a)(i)(B) will result in Policy 5-8 no longer giving effect to Policy 5-7 which clearly states that the management of land use activities affecting groundwater and surface water must give effect to the strategy for surface water quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6, by managing diffuse discharges of contaminants, in the manner specified by that Policy. The relief sought is the operative Policy 5-8(a)(i)(B) is retained without changes.</p> <p>A. Also see below commentary regarding the reference to the strategies on proposed Policy 5-8(a)(ii)(B), operative Policy 14-4 and proposed Policy 14-6(e)(v)</p> <p>2. The proposed deletion of Policy 5-8(a)(i)(B) will result in Policy 5-8 no longer implementing RPS Objective 2-1, Objective 5-1 and Objective 5-2. The relief sought is the operative Policy 5-8(a)(i)(B) is retained without changes.</p> <p>3. In Policy 5-8(a)(ii) it is unclear by how much nitrogen leaching needs to be reduced in order to minimize the degree of non-compliance, this wording should be amended to read as "****significantly reduce****" so as to make this clear.</p> <p>4. In Policy 5-8(a)(ii) it is unclear what "[[additional matters]]" are supposed to be, and this is not defined, therefore it is recommended that the wording be deleted. The proposed definition of GMP uses the terminology "practical measures and methods".</p> <p>5. In Policy 5-8(a)(ii) use of the work "[[degree]]" should be replaced with "****extent****" to be consistent with later use of the word in Policy 14-6.</p> <p>6. In Policy 5-8(a)(ii)(A) reference to the "cost of achieving the nitrogen leaching maximums".infers that the maximum values are met, which is unclear in the context of a policy which anticipates that the values are exceeded. The recommended wording change to read "****financial implications*** [[cost]] ***of achieving the nitrogen leaching maximums specified in (i), were they to be achieved****", better aligns with the RMA definition of best practicable option.</p> <p>7. In Policy 5-8(a)(ii)(B) reference to the strategy for groundwater and surface water quality is further justification for that reference to be retained in Policy 5-8(a)(i)(B).</p> <p>8. Policy 5-8(a)(iib) effectively grandparents existing exceedances of the maxima in Table 14.2 during the transitional period and is an unfair approach to those consent holders whom undertake immediate action to reduce nitrogen leaching within the same 5-year period. Grandparenting is contrary to best practice. It is recommended that the wording is amended to read</p> <p>"(iib) Existing land[^] use activities which do not comply with (ii) but ***can demonstrate a*** [[are intended to]] transition to an alternative non-intensive farming land[^] use must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition. ***For the avoidance of doubt subclause (ii) applies to transition farms. [[and only where there is no increase in the exceedance of the nitrogen leaching maximums established under (a)]]". so as to avoid grandparenting over the transitional period.</p> <p>[Note: Submitter provides tracked changes version of full Policy 5-8 in submission.]</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>9. The proposed wording of Method 5-12 does not integrate the needs of tangata whenua, and fails to place Te Ao Maori at the centre of the research.</p> <p>10. Recommend that the wording is amended to read "Support initiatives by local communities, [[and]] sector groups [[or]] in consultation with tangata whenua which develop options for sustainable land use in the Region".</p> <p>11. Recommend that the wording is amended to read "Local communities ***including tangata whenua,*** rural and other sector groups, Territorial Authorities, Regional Council."</p>
3	5	

12. Recommend that the wording is amended to read "Advice and assistance is available for landowners ~~and tangata whenua~~ in the Region regarding land use management practices."

[Note: Submitter provides tracked changes version of full Method 5-12 in submission.]

4 5

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13. The proposed working of Method 5-13 does not integrate the needs of tangata whenua, and promote the provision of information to tangata whenua.

14. Information produced under Method 5-13 should be provided to tangata whenua as part of the arrangements set out in RPS Chapter 2. Wording has been proposed "Horizons will serve copies of all reports published under this method to tangata whenua within the rohe to which the research applies."~~***~~

15. It is recommended that the wording be amended to read "Regional Council, ~~***tangata whenua***~~, rural sector groups, and nutrient management model providers."

[Note: Submitter provides tracked changes version of full Method 5-13 in submission.]

5 14

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19. It is proposed that all proposed changes to operative Policy 14-3 are rejected.

20. It is proposed that the only change to the operative Policy is to insert the wording "good management practices", " is inserted into Operative Policy 14-3 to read: "The Regional Council will examine on an on-going basis relevant industry-based standards (including good management practices* guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5."

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21. In Policy 14-5(b)(i), the introduction of new Footnote 1 creates an unclear situation whether an intensive farming land use that was converted after 24 August 2010 (dairy farming) or after 9 May 2013 (commercial vegetable growing, cropping and intensive sheep and beef) but before the dates listed in Table 14.1, is to be considered as 'new' or 'existing' for the purpose of the plan provisions. It is recommended that the new footnote be deleted.

22. The retention of the wording "affecting groundwater and surface water^ quality" in proposed Policy 14-5 is further justification for Policy 5-8(a)(i)(B) to be retained.

[Note: Submitter provides tracked changes version of full Policy 14-5 in submission.]

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23. Policy 14-6(b) should be amended to replace the word '[manage]' with ~~***minimise***~~ in relation to nutrient leaching and run-off.

24. There is a formatting error where operative Policy 14-6(c) has been deleted. In the notified version of the plan wording, the new policy 14-6(c) beginning "Ensure that cattle are excluded." is actually operative Policy 14-6(d). This error is inconsequential but it is unclear what has been amended.

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27. In proposed Policy 14-6(d)(ii) there is no restriction on the ability of a consent holder to reapply for a replacement consent upon expiry of the transition consent. The wording "or to 31 December 2025 (which ever comes first)" should be inserted, which aligns with the NPS Freshwater Management 2014.

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those matters in (A) - (C). If an applicant were to present an assessment of the BPO, that would likely cover of those matters identified in (A)-(C) and therefore their prioritisation is unnecessary and unhelpful.

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34. Under Policy 14-6(e), the decision maker is required to have regard to the matters listed in (i) through (v). Clause (i) contains three matters which are to be given particular regard. While considering clause (iii), additional matters are introduced in that clause ((iii)). Therefore, it is recommended that the word 'particular' is inserted before the word regard.

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[Note: Submitter provides tracked changes version of full Policy 14-6 in submission.]

8 GEN

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Submitter seeks addition of four new Water Management Sub-zones to Table 14.1: Middle Manawatu Mana_10, Lower Manawatu Mana_11, Oroua Mana_12, and Coastal Manawatu Mana_13.

[Note: Submitter provides tracked changes version of full Table 14.1 in submission.]

9	14	<p>43. The effects of the proposed changes on environmental and cultural values in the coastal lakes of the Horowhenua and Rangitikei have not been assessed by the Regional Council. The relief sought is that Regional Council provides an assessment on the expected loads entering those water bodies as a result of the proposed changes to the Table 14.2.</p> <p>44. The relief sought is that the Regional Council amend Policy 14-5 to include a clause specifying the timing, trigger and method for review of Table 14.2, and Policy 14-6(e)(ii) is deleted. Note that plan review policies are also present in Chapter 12.</p>
10	14	<p>45. Demonstration of compliance with the cumulative nitrogen leaching maximum specified in Table 14.2 is a Condition/Standard/Term of Rule 14-1. Therefore, it is appropriate to retain the original wording of matter of control (b).</p> <p>46. It is recommended that the original wording be reinstated "compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2" as matter of control (b).</p> <p>47. It is recommended that the new proposed wording be introduced as a new matter, either noted as (ba) or (j) "good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land^.</p> <p>48. In proposed Rule 14-1, the reference to Policy 14-6 is unnecessary and should be removed.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-1 in submission.]</p>
11	14	<p>52. It is recommended that the rule wording be amended to read "Existing intensive farming land^ use activities not complying with any of the conditions, standards and terms [(a), (b) and] (d) to (i) of Rule 14-1", and that the new Conditions/Standards/Terms (a), (b) and (c) of Rule 14-2 be retained.</p> <p>53. In Rule 14-2, the proposed deletion of the matter of discretion (b) is accepted as an exceedance of the CNLM cannot occur under proposed Rule 14-2.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-2 in submission.]</p>
12	14	<p>54. Amending Rule 14-2A to capture non-compliance with Conditions/Standards/Terms (a), (b) and (c) of Rule 14-1 would complement the changes to Rule 14-2 which captures Conditions (d) to (j) of Rule 14-1. This approach is simpler than the amendments proposed.</p> <p>55. In the case of Rule 14-2A, the context for a resource consent is one in which the demonstrated benefits of meeting the cumulative nitrogen leaching maximums is not achieved, and there is the potential for significant adverse effects on the environment. Given the strong policy direction (from Policy 5-7, 5-8, 14-5 and 14-6) to regulate excessive nutrient loss from land uses, a non-complying activity status is appropriate with the s104D threshold tests that require the adverse effects on the environment are not more than minor, or the application is not contrary to the objectives and policies of the Plan. The application of these tests is entirely appropriate in an environment that is facing significant stressors. This approach is consistent with the Quality Planning note on activity status.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-2A in submission.]</p>
13	GL	<p>58. The relief sought is:</p> <p>A. 1) A new Schedule K (titled 'Good management practices') to the Regional Plan is introduced which lists 'on-farm practical measures and methods' which can be considered to be GMP under Rules 14-1, 14-2 and 14-2A; and</p> <p>B. 2) Operative Policy 14-3 is amended to read: "The Regional Council will examine on an on-going basis relevant industry-based standards (including good management practices* guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5."</p> <p>[Note: Submitter provides tracked changes version of full Policy 14-3 in submission.]</p>
14	GL	<p>61. The relief sought is that the definition of NMP, and all references to NMP within the One Plan are replaced with "Farm Environment Plan", and new criteria are developed to specify the informational requirements of that FEP.</p>

Submitter Number: 69

Neil Filer
147 Maharahara Road
R D 2
Dannevirke

Summary of Decision(s) Requested for Submitter Number: 69

Statement#	Topic	Decision Requested
1	GEN	6. I support the submissions that have been lodged by OairyNZ and Federated Farmers and the relief they have sought.

Submitter Number: 70

**Te Rūnanga o Raukawa
70 Ruamahanga Crescent**

Palmerston North

Jessica Stevenson

Summary of Decision(s) Requested for Submitter Number: 70

Statement#	Topic	Decision Requested
1	GEN	Refuse entire plan change
2	5	[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.] 1. The proposed deletion of Policy 5-8(a)(i)(B) will result in Policy 5-8 no longer giving effect to Policy 5-7 which clearly states that the management of land use activities affecting groundwater and surface water must give effect to the strategy for surface water quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6, by managing diffuse discharges of contaminants, in the manner specified by that Policy. The relief sought is the operative Policy 5-8(a)(i)(B) is retained without changes. A. Also see below commentary regarding the reference to the strategies on proposed Policy 5-8(a)(ii)(B), operative Policy 14-4 and proposed Policy 14-6(e)(v) 2. The proposed deletion of Policy 5-8(a)(i)(B) will result in Policy 5-8 no longer implementing RPS Objective 2-1, Objective 5-1 and Objective 5-2. The relief sought is the operative Policy 5-8(a)(i)(B) is retained without changes. 3. In Policy 5-8(a)(iia) it is unclear by how much nitrogen leaching needs to be reduced in order to minimize the degree of non-compliance, this wording should be amended to read as "****significantly reduce****" so as to make this clear. 4. In Policy 5-8(a)(iia) it is unclear what "[[additional matters]]" are supposed to be, and this is not defined, therefore it is recommended that the wording be deleted. The proposed definition of GMP uses the terminology "practical measures and methods". 5. In Policy 5-8(a)(iia) use of the work "[[degree]]" should be replaced with "****extent****" to be consistent with later use of the word in Policy 14-6. 6. In Policy 5-8(a)(iia)(A) reference to the "cost of achieving the nitrogen leaching maximums".infers that the maximum values are met, which is unclear in the context of a policy which anticipates that the values are exceeded. The recommended wording change to read "****financial implications*** [[cost]] ***of achieving the nitrogen leaching maximums specified in (i), were they to be achieved****", better aligns with the RMA definition of best practicable option. 7. In Policy 5-8(a)(iia)(B) reference to the strategy for groundwater and surface water quality is further justification for that reference to be retained in Policy 5-8(a)(i)(B). 8. Policy 5-8(a)(iib) effectively grandparents existing exceedances of the maxima in Table 14.2 during the transitional period and is an unfair approach to those consent holders whom undertake immediate action to reduce nitrogen leaching within the same 5-year period. Grandparenting is contrary to best practice. It is recommended that the wording is amended to read "(iib) Existing land [^] use activities which do not comply with (ii) but ***can demonstrate a*** [[are intended to]] transition to an alternative non-intensive farming land [^] use must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition. ***For the avoidance of doubt subclause (iia) applies to transition farms. [[and only where there is no increase in the exceedance of the nitrogen leaching maximums established under (a)]]". so as to avoid grandparenting over the transitional period. [Note: Submitter provides tracked changes version of full Policy 5-8 in submission.] 3 5 [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.] 9. The proposed wording of Method 5-12 does not integrate the needs of tangata whenua, and fails to place Te Ao Maori at the centre of the research. 10. Recommend that the wording is amended to read "Support initiatives by local communities, [[and]] sector groups [[or]] in consultation with tangata whenua which develop options for sustainable land use in the Region". 11. Recommend that the wording is amended to read "Local communities ****including tangata whenua,*** rural and other sector groups, Territorial Authorities, Regional Council."

12. Recommend that the wording is amended to read "Advice and assistance is available for landowners ~~***~~and tangata whenua~~***~~ in the Region regarding land use management practices."
- [Note: Submitter provides tracked changes version of full Method 5-12 in submission.]
- 4 5 [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ~~***~~s is underline to signify text sought to be added.]
13. The proposed working of Method 5-13 does not integrate the needs of tangata whenua, and promote the provision of information to tangata whenua.
14. Information produced under Method 5-13 should be provided to tangata whenua as part of the arrangements set out in RPS Chapter 2. Wording has been proposed "Horizons will serve copies of all reports published under this method to tangata whenua within the rohe to which the research applies."~~***~~"
15. It is recommended that the wording be amended to read "Regional Council, ~~***~~tangata whenua~~***~~, rural sector groups, and nutrient management model providers."
- [Note: Submitter provides tracked changes version of full Method 5-13 in submission.]
- 5 14 [Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ~~***~~s is underline to signify text sought to be added.]
19. It is proposed that all proposed changes to operative Policy 14-3 are rejected.
20. It is proposed that the only change to the operative Policy is to insert the wording "good management practices", " is inserted into Operative Policy 14-3 to read: "The Regional Council will examine on an on-going basis relevant industry-based standards (including good management practices* guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5."
- [Note: Submitter provides tracked changes version of full Policy 14-3 in submission.]
- 6 14 21. In Policy 14-5(b)(i), the introduction of new Footnote 1 creates an unclear situation whether an intensive farming land use that was converted after 24 August 2010 (dairy farming) or after 9 May 2013 (commercial vegetable growing, cropping and intensive sheep and beef) but before the dates listed in Table 14.1, is to be considered as 'new' or 'existing' for the purpose of the plan provisions. It is recommended that the new footnote be deleted.
22. The retention of the wording "affecting groundwater and surface water^ quality" in proposed Policy 14-5 is further justification for Policy 5-8(a)(i)(B) to be retained.
- [Note: Submitter provides tracked changes version of full Policy 14-5 in submission.]
- 7 14 Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ~~***~~s is underline to signify text sought to be added.]
23. Policy 14-6(b) should be amended to replace the word ~~'[[manage]]'~~ with ~~''***minimise***'~~ in relation to nutrient leaching and run-off.
24. There is a formatting error where operative Policy 14-6(c) has been deleted. In the notified version of the plan wording, the new policy 14-6(c) beginning "Ensure that cattle are excluded." is actually operative Policy 14-6(d). This error is inconsequential but it is unclear what has been amended.
25. In proposed policy 14-6(d)(i) it is unclear what constitutes "additional innovations and measures" or why they are required in addition to GMP to further reduce nutrient leaching. This wording should be deleted. The proposed definition of GMP uses the term "practical measures and methods".
26. In proposed policy 14-6(d)(i) it is unclear what time frame is intended with the use of wording "progressively over time". The wording "and to not exceed the cumulative nitrogen leaching maximum* for Year-20 in Table 14.2" should be inserted.
27. In proposed Policy 14-6(d)(ii) there is no restriction on the ability of a consent holder to reapply for a replacement consent upon expiry of the transition consent. The wording "or to 31 December 2025 (which ever comes first)" should be inserted, which aligns with the NPS Freshwater Management 2014.
28. In proposed Policy 14-6(e)(i) the wording "proposed innovations and measures represent" is undefined and should be replaced with "proposal represents". It is also unclear from the policy whether the BPO must be required for a proposal to be eligible for an exemption under (d)(i).

29. In proposed Policy 14-6(e)(i), use of the wording "having particular regard to" places a higher importance on those listed matters compared to whether the proposal is the BPO, which is defined in the Act and does not consider those matters in (A) - (C). If an applicant were to present an assessment of the BPO, that would likely cover of those matters identified in (A)-(C) and therefore their prioritisation is unnecessary and unhelpful.

30. In proposed Policy 14-6(e)(i)(A), consideration of the extent of the exceedance is unhelpful when considering how much of an exceedance is appropriate, and this is also not an effects-based test. It is recommended that this be clarified as to what extent is acceptable and unacceptable.

31. In proposed Policy 14-6(e)(i)(B), it is important to consider both the quantity and the rate of reduction. It is proposed that the wording be amended to read "(B) The proportion and rate of reduction of nitrogen loss...".

32. In proposed Policy 14-6(e)(i)(C), it is unclear what aspects the 'further reductions' are targeting. It is recommended that the wording be inserted "further reductions ***in nutrient leaching and run-off, faecal contamination and sediment losses from the land*** are currently possible."

33. In proposed Policy 14-6(e)(ii), the reference to future versions of OVERSEER is ultra vires and contrary to caselaw that documents incorporated by reference cannot include 'subsequent versions or revisions', and any rule in a plan that purports to do so is ultra vires (Telecom New Zealand Limited v Christchurch City Council [2003] NZRMA 280). This clause (ii) should be deleted.

34. Under Policy 14-6(e), the decision maker is required to have regard to the matters listed in (i) through (v). Clause (i) contains three matters which are to be given particular regard. While considering clause (iii), additional matters are introduced in that clause ((iii)). Therefore, it is recommended that the word 'particular' is inserted before the word regard.

35. In proposed Policy 14-6(e)(iv), the wording ", over time," adds little value as it is inferred by the word progressive and should be deleted. The word 'demonstrated' should be inserted to read "The contribution of the progressive reduction in nutrient leaching and run-off, faecal contamination and sediment losses from the land^ to the demonstrated improvement of water^ quality within that Water Management Sub-zone*:"

36. In proposed Policy 14-6(e)(v), reference to the ground- and surface water quality strategies in the RPS policies is further justification for the retention of Policy 5-8(a)(i)(B).

37. Proposed Policy 14-6 does not provide any regard for wetlands or lakes that are a rare habitat or threatened habitat. Policy 14-6 should be amended to include "(e)(vi) The presence of wetlands^ or lakes^ that are a rare habitat* or threatened habitat*."

38. Proposed Policy 14-6(f)(i) use of the word 'measures' should be amended to 'good management practices*', as measures is not defined in this context.

39. Proposed Policy 14-6(f)(i) should be amended to read "[do not increase] ***significantly decrease***", to be consistent with the sought changes to Policy 5-8(a)(ia).

40. Proposed Policy 14-6(f)(ii) should be amended to include the wording "adverse effects caused by".

41. Proposed Policy 14-6(f)(ii) should be amended to read "The nature, sequencing, measurability and enforceability of ***the programme of deintensification committed in order to*** [[any steps proposed to]] transition out of the intensive farming land^ use by the expiry of the resource consent^***, or before 31 December 2025 (whichever comes first).****" This approach is more transparent and enforceable, and the timeframe is consistent with NPS Freshwater Management 2014.

[Note: Submitter provides tracked changes version of full Policy 14-6 in submission.]

8 GEN

42. Operative Table 14.1 is created by Policy 14-5(b)(i), and in turn Policy 14-5 gives effect to RPS and Policy 5-8. Plan Change 2 (as notified) includes changes to both Policy 5-8 and Policy 14-5(b)(i). The proposed Table 14.1, in its version included in the notified plan change, no longer give effect to Policy 14-5(b)(i) or Policy 5-8 and therefore must be amended based on most recent science.

Submitter seeks addition of four new Water Management Sub-zones to Table 14.1: Middle Manawatu Mana_10, Lower Manawatu Mana_11, Oroua Mana_12, and Coastal Manawatu Mana_13.

[Note: Submitter provides tracked changes version of full Table 14.1 in submission.]

9 14

43. The effects of the proposed changes on environmental and cultural values in the coastal lakes of the Horowhenua and Rangitikei have not been assessed by the Regional Council. The relief sought is that Regional Council provides an assessment on the expected loads entering those water bodies as a result of the proposed changes to the Table 14.2.

44. The relief sought is that the Regional Council amend Policy 14-5 to include a clause specifying the timing, trigger and method for review of Table 14.2, and Policy 14-6(e)(ii) is deleted. Note that plan review policies are also present in Chapter 12.

10	14	<p>45. Demonstration of compliance with the cumulative nitrogen leaching maximum specified in Table 14.2 is a Condition/Standard/Term of Rule 14-1. Therefore, it is appropriate to retain the original wording of matter of control (b).</p> <p>46. It is recommended that the original wording be reinstated "compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2" as matter of control (b).</p> <p>47. It is recommended that the new proposed wording be introduced as a new matter, either noted as (ba) or (j) "good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land^.</p> <p>48. In proposed Rule 14-1, the reference to Policy 14-6 is unnecessary and should be removed.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-1 in submission.]</p>
11	14	<p>52. It is recommended that the rule wording be amended to read "Existing intensive farming land^ use activities not complying with any of the conditions, standards and terms [(a), (b) and] (d) to (i) of Rule 14-1", and that the new Conditions/Standards/Terms (a), (b) and (c) of Rule 14-2 be retained.</p> <p>53. In Rule 14-2, the proposed deletion of the matter of discretion (b) is accepted as an exceedance of the CNLM cannot occur under proposed Rule 14-2.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-2 in submission.]</p>
12	14	<p>54. Amending Rule 14-2A to capture non-compliance with Conditions/Standards/Terms (a), (b) and (c) of Rule 14-1 would complement the changes to Rule 14-2 which captures Conditions (d) to (j) of Rule 14-1. This approach is simpler than the amendments proposed.</p> <p>55. In the case of Rule 14-2A, the context for a resource consent is one in which the demonstrated benefits of meeting the cumulative nitrogen leaching maximums is not achieved, and there is the potential for significant adverse effects on the environment. Given the strong policy direction (from Policy 5-7, 5-8, 14-5 and 14-6) to regulate excessive nutrient loss from land uses, a non-complying activity status is appropriate with the s104D threshold tests that require the adverse effects on the environment are not more than minor, or the application is not contrary to the objectives and policies of the Plan. The application of these tests is entirely appropriate in an environment that is facing significant stressors. This approach is consistent with the Quality Planning note on activity status.</p> <p>[Note: Submitter provides tracked changes version of full Rule 14-2A in submission.]</p>
13	GL	<p>58. The relief sought is:</p> <p>A. 1) A new Schedule K (titled 'Good management practices') to the Regional Plan is introduced which lists 'on-farm practical measures and methods' which can be considered to be GMP under Rules 14-1, 14-2 and 14-2A; and</p> <p>B. 2) Operative Policy 14-3 is amended to read: "The Regional Council will examine on an on-going basis relevant industry-based standards (including good management practices* guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects^ to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5."</p> <p>[Note: Submitter provides tracked changes version of full Policy 14-3 in submission.]</p>
14	GL	<p>61. The relief sought is that the definition of NMP, and all references to NMP within the One Plan are replaced with "Farm Environment Plan", and new criteria are developed to specify the informational requirements of that FEP.</p>

Submitter Number: 71

**Joanne Meri Teresa Heperi
(on behalf of Rangitāne o Tamaki Nui a Rua)
7 Takapau Ormondville Road**

**Takapau
4203**

Summary of Decision(s) Requested for Submitter Number: 71

Statement#	Topic	Decision Requested
1	GEN	We support in principle this proposed Plan Change 2. However, we seek greater consideration of our cultural values, methodologies and frameworks in decision-making relating to the consenting processes, land uses and monitoring of the waterways. . We want to continue to be notified as an affected party when it is determined in the consenting process. We seek further engagement with iwi in our rohe concerned about the freshwater quality and how it will be improved. We seek to affirm our value of Whanaungatanga, by building on our relationship through mutual respect and authenticity to reach a level of trust that is comfortable for us both. Mauri Ora

Submitter Number: 72

**Ballance Agri-Nutrients Limited
Private Bag 12 503, Tauranga Mail Centre**

**Tauranga
3143**

Dominic Adams - Environmental Manager

Summary of Decision(s) Requested for Submitter Number: 72

Statement#	Topic	Decision Requested
1	5	<p>Retain changes to Policy 5-8 as notified.</p> <p>Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.</p>
2	14	<p>Support using consistent, industry accepted terminology. GMP is a recognised term, used around the country.</p> <p>Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.</p>
3	14	<p>Retain changes to Policy 14-5 as notified.</p> <p>Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.</p>
4	14	<p>Retain Policy 14-6; and</p> <p>Add new clauses (g) and (h):</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>***(g) Provide for exceptions to (a) for new intensive farming land[^] uses that exceed the cumulative nitrogen leaching maximum*, where:</p> <p>(i) Good management practices* are implemented in accordance with a nutrient management plan*, along with additional innovations and measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land[^] progressively over time.</p> <p>(h) When considering an application for resource consent under (g), have regard to:</p> <p>(i) The extent to which the non-compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2 is attributable to updates in versions of OVERSEER; ***</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.</p>
5	5	<p>Retain Method 5-13 as notified; and</p> <p>Add a new bullet to Method 5-13:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>***- The assessment criteria for nutrient management models appropriate for use in intensive farming are published on Horizons' website.***</p> <p>Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.</p>
6	14	<p>Amend Table 14.2 as follows:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Table 14.2 Cumulative nitrogen leaching maximum by Land Use Capability Class***, as calculated by Overseer version 6.3.1.***</p> <p>Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.</p>

7 14

As a consequence of the changes sought to Rule 14-2, amend condition (a) as follows:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

(a) A nutrient management plan* must be prepared for the land^ ***every three years, or following any significant farm system change***, and provided ~~[[annually]]~~ to the Regional Council. ***NMP's must be reviewed annually to confirm ongoing appropriateness and where changes to the NMP are implemented, the Regional Council must be notified.***

Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.

8 14

Amend condition (a) as follows:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

(a) A nutrient management plan* must be prepared for the land^ ***every three years, or following any significant farm system change***, and provided ~~[[annually]]~~ to the Regional Council. ***NMP's must be reviewed annually to confirm ongoing appropriateness and where changes to the NMP are implemented, the Regional Council must be notified.***

Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.

9 14

Retain Rule 14-2A as notified.

Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.

10 GL

Support using consistent terminology;

Amend the definition of Good Management Practices to refer primarily to the Industry Agreed Good Management Practices relating to Water quality (Matrix of Good Management, 2015).

Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.

11 GL

Support using consistent terminology;

Amend the definition of Nutrient Management Plan as follows:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

means a plan prepared ~~[[annually]]~~ in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers' Research Association ~~[[2007]]~~ ***2013***) which records (including copies of the OVERSEER input and output files of a recognised nutrient management model used to prepare the plan) and takes into account all sources of nutrients for intensive farming and identifies all current and relevant nutrient management practices and mitigations, ~~[[and]]~~ which is prepared by a person who has both a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University, ***is reviewed annually and updated following any significant change to farming system.***

Consequently, amend Rule 14-5 to delete reference to the 2007 CoP and insert reference to the 2013 CoP.

Ballance seeks the relief set out in this submission, including such other additional, alternative or consequential relief as may be necessary to give effect to the changes sought.

Submitter Number: 73

**Vincent John Payne
1602 Top Grass Road**

Summary of Decision(s) Requested for Submitter Number: 73

Statement#	Topic	Decision Requested
1	GEN	Delete Overseer and table of LUC

Submitter Number: 74

**Beef + Lamb New Zealand
P O Box 8448**

**Havelock North
4157
Dylan Muggeridge**

Summary of Decision(s) Requested for Submitter Number: 74

Statement#	Topic	Decision Requested
1	5	Policy 5-8
2	5	Retain as proposed (Note further detail in submission points 2 to 7 relating to Policy 5-8) Policy 5-8 (a)(i)(A) and (B)
3	5	Retain as proposed Policy 5-8 (a) (i) (C) (C) are achievable on most farms using [[good management principles*]] ***good farming practice principles* . *** (References "The Good Farming Practice Action Plan for Water Quality 2018" found at http://www.fedfarm.org.nz/FFPublic/Policy2/National/Good_Farming_Practice-Action_Plan_for_Water_Quality_2018.aspx) The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.
4	5	Policy 5-8 (a) (ii) Amend numbering as required pending changes to (iia) and (iib). The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.
5	5	Policy 5-8(a)(iia)(A) and (B) (iia) Existing intensive land ^A use activities which do not comply with (ii) must be regulated to reduce nitrogen leaching which is in excess of the nitrogen leaching maximums established under (a) by implementing [[good management practice]] ***good farming practice principles* , *** and additional measures to [[minimise the degree of non-compliance]] ***become compliant over time,*** having regard to: (A) [[the feasibility, practicality, and cost of achieving the nitrogen leaching maximums specified in (i); and]] best practicable options towards achieving policies 5-1 and 5-2. *** (B) the Land Use Classification of the property and its relation to Table 14.2*** (C) the strategy for surface water ^A quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.
6	5	Policy 5-8 (a) (iib) Retain as proposed
7	5	Policy 5-8 (d) (d) [[Good management practices]] ***Good farming practice principles* *** (i) All intensive farming land ^A use activities must be regulated to manage nutrient leaching and run-off, faecal contamination, and sediment losses in accordance with [[good management practices]] ***good farming practice principles* . *** The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

8	5	<p>First bullet in "Target"</p> <p>Delete the sentence "Horizons will consider whether it needs to respond to changes in Overseer through a plan change process".</p> <p>The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</p>
9	14	<p>Policy 14-3: [[Good management practices]] ***good farming practice principles* ***</p> <p>When making decisions on resource consent^A applications, and setting consent conditions, for activities affecting groundwater and surface water^A quality, the Regional Council must have regard to [[good management practices]] ***good farming practice principles* *** to the extent that those [[good management practices]] ***good farming practice principles* *** address the matters in Policies 14-1, 14-2, 14-4, and 14-5 and 14-6, ***and contribute to meeting the targets contained in Schedule E.***</p> <p>The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</p>
10	14	<p>Policy 14-6 (b)</p> <p>(b) Ensure implementation of [[good management practices]] ***good farming practice principles* ***to manage nutrient leaching and run-off, faecal contamination and sediment loss, as part of any intensive farming land^A use, ***consistent with Objectives 5-1 and 5-2, and Schedule E.***</p> <p>The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</p>
11	14	<p>Policy 14-6 (b) (i) and (ii)</p> <p>(i) [[Good management practices]] ***good farming practice principles*** to minimise the loss of nitrogen, phosphorus, faecal contamination and sediment are implemented.</p> <p>Retain (ii).</p> <p>The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</p>
12	14	<p>Policy 14-6 (d) (i) and (ii)</p> <p>(i) [[Good management practices]] ***Good farming practice principles* *** are implemented in accordance with a nutrient management plan*, along with additional innovations and measures to further reduce nutrient leaching and run-off, faecal contamination and sediment losses from the land^A progressively over time; or</p> <p>The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</p>
13	14	<p>Policy 14-6 (e) and (f)</p> <p>(e) When determining whether to enable an existing intensive farm land^A use to continue under (d)(i) have regard to:</p> <p style="padding-left: 40px;">[...]</p> <p>(iii) The nature and characteristics of the land^A, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, [[and]] topography and Land Use Capability units of the property.</p> <p>Also delete (f)(i), and ensure that existing land uses are not grand-parented to historical emissions profiles, and that emissions are required to reduce over time.</p> <p>The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</p>
14	14	<p>Ensure that the maximum nitrogen leaching numbers in Table 14.2:</p> <ul style="list-style-type: none"> - are based on LUC - relate to the natural capital of soils - apply to intensive systems as defined by the One Plan - set a trajectory of improvement towards the water quality outcomes as set out in Schedule E.

- 15 14 (b) [[good management practices]] ***good farming practice principles* *** to avoid, remedy or mitigate nutrient leaching and run-off, faecal contamination and sediment losses from the land^
- The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.
- 16 14 (b) [[good management practices]] ***good farming practice principles* *** to avoid, remedy or mitigate nutrient leaching and runoff, faecal contamination and sediment losses from the land^
- The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.
- 17 GL [[Good management practices]] ***Good farming practice principles*** refers to ***the agreed national good farming practice principles contained in the document Good Farming Practice Action Plan for Water Quality 2018*** [[evolving practical measures and methods, including those established in industry-based standards,]] which are used at a sector or community level to minimise the effects of discharges to land^ and water^.
- The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Submitter Number: 75

**Potatoes New Zealand
P O Boox 10-232**

Wellington

Nicola Loach

Summary of Decision(s) Requested for Submitter Number: 75

Statement#	Topic	Decision Requested
1	5	<p>NEW POLICY 5-8A</p> <p>***Policy 5-8A: Management and regulation of commercial vegetable production land[^] use activities affecting groundwater and surface water[^] quality</p> <p>Recognise the particular constraints that apply to commercial vegetable production (including the need to rotate crops to avoid soil- borne diseases and for growing locations in close proximity to processing facilities), while giving effect to Policy 5-7 to manage the effects on groundwater and surface water by providing a nutrient management framework that appropriately responds to and accommodates these constraints while improving or maintaining water quality by:</p> <ul style="list-style-type: none">a) requiring commercial vegetable growing operations to operate at good management practice;b) ensuring new commercial vegetable growing operations, or any expansion of an existing commercial vegetable growing operation is limited to the baseline commercial vegetable growing area, unless the nitrogen losses from the operation can be accommodated within the Table 14.2A nitrogen loss rate limits at the new location(s);c) requiring commercial vegetable growing operations to demonstrate, at the time of application for resource consent and at the time of any Nutrient Management Plan audit, how any relevant nutrient loss reductions will be achieved;d) constraining, unless a farming enterprise, commercial vegetable growing operations to a single water management sub-zone; ande) requiring a Rotation Management Plan as part of any application for resource consent, and requiring that Rotation Management Plan to be prepared in accordance with Schedule X of this Plan.***
2	5	<p>Policy 5-8 (i) (B) and c</p> <p>(B) recognise the productive capability of land[^] ***including commercial vegetable growing areas*** in the Water Management Sub-zone*</p> <p>(C) are achievable on all farms using good management practices ***and recognising the rotation requirements for vegetable growing.* ***</p>
3	14	<p>NEW POLICY 14-5A</p> <p>***Policy 14-5A: Management of commercial vegetable production land[^] uses</p> <p>In order to give effect to Policy 5-7, and Policy 5-8A, commercial vegetable production land[^] use activities affecting groundwater and surface water[^] quality must be managed in the following manner:</p> <ul style="list-style-type: none">a) Commercial vegetable production land is within the baseline commercial production area within each water management sub-zone.b) Except as provided for in (d) below, commercial vegetable production land[^] uses regulated in accordance with Policy 5-8A, must be managed to ensure that the leaching of nitrogen from those land[^] uses does not exceed the cumulative nitrogen leaching maximum* values contained in Table 14.2A.c) A Rotation Management Plan (RMP) is prepared in accordance with Schedule X for applications where the commercial vegetable production is across more than one Water Management sub-zones.d) Where nitrogen leaching from commercial vegetable production land exceeds the cumulative nitrogen leaching maximum* values contained in Table 14.2A a decision support tool is used to assess risks to groundwater and surface water and predict mitigation actions in accordance with Schedule X.***

Policy 14-6A: Management of commercial vegetable production land[^] uses

When making decisions on resource consent[^] applications, and setting consent conditions[^], for commercial vegetable production land[^] uses the Regional Council must:

- (a) Ensure the nitrogen leaching from the land[^] is managed in accordance with Policy 14-5A.
- (b) Ensure implementation of good management practices* to manage nutrient leaching and run-off, and sediment loss, as part of any commercial vegetable production land[^] use.
- (c) Provide for exceptions to (a) for existing commercial vegetable production land[^] uses that exceed the cumulative nitrogen leaching maximum* where:
 - (i) Good management practices* are implemented in accordance with a nutrient management plan*, along with monitoring and performance measures to further reduce nutrient leaching and run-off, and sediment losses from the land[^] progressively over time; or
 - (ii) The existing commercial vegetable production land[^] use is to continue for no commercial vegetable growing area without an increase in nutrient leaching and run-off, and sediment losses from the land[^] over that period of time.
- (d) When determining whether to enable an existing intensive farm land[^] use to continue under (c)(i), have regard to:
 - (i) Whether the proposed monitoring and performance measures represent the best practicable option[^] to minimise the nutrient leaching and run-off, and sediment losses from the land[^], having particular regard to:
 - (A) The extent of the exceedance of the cumulative nitrogen leaching maximum* in Table 14.2A;
 - (B) The rate of reduction of nitrogen loss towards the cumulative nitrogen leaching maximum* in Table 14.2A;
 - (C) The mitigation actions and controls in accordance with a Rotation Management Plan meet the Surface Water Quality Targets in Schedule E.
 - (D) Whether further reductions are currently possible for the commercial vegetable production land[^] use based on existing technologies.
 - (ii) The extent to which the non-compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2A is attributable to updates in versions of OVERSEER;
 - (iii) The nature and characteristics of the land[^], having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property;
 - (iv) The contribution of the progressive reduction in nutrient leaching and run-off, and sediment losses from the land[^], over time, to the improvement of water[^] quality within that Water Management Sub-zone*;
 - (v) The strategy for surface water[^] quality set out in Policies 5-2, 5-3, 5-4 and 5-5, and the strategy for groundwater quality in Policy 5-6.
- (e) When determining whether to enable the existing commercial vegetable production land[^] use is to continue under (c)(ii), have regard to:
 - (i) Measures implemented in accordance with a nutrient management plan* to ensure that nutrient leaching and run-off, and sediment losses from the land[^] do not increase over the duration of the resource consent[^];
 - (ii) good management practices* proposed to avoid, remedy or mitigate nutrient leaching and run-off, and sediment losses from the land[^];
 - (iii) the nature, sequencing, measurability and enforceability of any steps proposed to transition to alternative baseline commercial vegetable growing area use by the expiry of the resource consent[^].

5 14

NEW TABLE 14-2A

***Table 14.2A sets out the cumulative nitrogen leaching maximum* for the land^ used for commercial vegetable production land^ use activities within each specified land use capability class*. Table 14.2A Cumulative nitrogen leaching maximum as determined across a rotation by Land Use Capability Class*

Period (from the year that the rule has legal effect	LUC* I	LUC* II	LUC* III
Baseline commercial vegetable production area.	51	45	40
New commercial vegetable production areas	46	42	35

6 14

NEW RULE 14-1AA for Commercial Vegetable Production Activities.

Rule

***14-1AA ***

Activity

The use of land^ pursuant to s9(2) RMA for commercial vegetable production and any ancillary discharge^ of contaminants^ into air pursuant to s15(1) or 15(2A) RMA.

Classification

Permitted

Conditions/Standards/Terms

***(a) The area of land in commercial vegetable production must be less than 4.1Ha.

(b) The discharge^ of fertiliser* onto or into land^ and any ancillary discharge^ of contaminants^ into air must comply with the conditions^ of Rule 14-5.

(c) All activities must be undertaken in accordance with good management practice.***

7 14

NEW RULE 14-1A for Commercial Vegetable Production Activities.

Rule

14-1A Existing Commercial Vegetable Production land^ use activities

Activity

The existing use of land^ pursuant to s9(2) RMA for commercial vegetable production land that is within the baseline commercial growing area in the Water Management Sub-zones* listed in; and from the dates specified in Table 14.1 and any ancillary discharge of contaminants^ into air pursuant to ss15(1) or 15(2A) RMA..

Classification

Controlled

Conditions/Standards/Terms

***(a) A nutrient management plan* must be prepared for the land^, and provided annually to the Regional Council.

(b) The activity must be undertaken in accordance with the nutrient management plan* prepared under (a).

(c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss from the activity will not exceed the cumulative nitrogen leaching maximum* specified in Table 14.2A.

(d) The discharge^ of fertiliser* onto or into land^ and any ancillary discharge^ of contaminants^ into air must comply with the conditions^ of Rule 14-5.

(e) The discharge^ of grade Aa biosolids* or compost* onto or into production land^ and any ancillary discharge^ of contaminants^ into air must comply with the conditions^ of Rule 14-7.

(f) The discharge^ of poultry farm litter* onto or into production land^ and any ancillary discharge^ of contaminants^ into air must comply with the conditions^ of Rule 14-9.

(g) The discharge[^] of farm animal effluent* onto or into production land[^] including:

(i) effluent from dairy sheds and feedpads*

(ii) effluent received from piggeries

(iii) sludge from farm effluent ponds

(iv) poultry farm effluent and any ancillary discharge[^] of contaminants[^] into air must comply with the conditions[^], standards and terms of Rule 14-1***.

Control/Discretion Non-notified

***Control is reserved over:

(a) the implementation of the nutrient management plan*

(b) compliance with the cumulative nitrogen leaching maximum* specified in Table 14.2A

(c) good management practices* to avoid, remedy or mitigate nutrient leaching and run-off, and sediment losses from the land[^]

(d) the matters of control in Rule 14-11

(e) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift

(f) provision of information including the nutrient management plan*

(g) duration of consent

(h) review of consent conditions[^]

(i) compliance monitoring

(j) the matters in Policies 14-5A, 14-6A and 14-9

Resource consent[^] applications under this rule[^] will not be notified and written approval of affected persons will not be required (notice of applications need not be served[^] on affected persons)***

8 14

NEW RULE 14-2AA for Commercial Vegetable Production Activities.

Rule

14-2AA New Vegetable Production Activities within the baseline commercial vegetable production land area.

Activity

***The use of land[^] pursuant to s9(2) RMA for commercial vegetable growing that is within the baseline commercial vegetable production area but was not existing in the Water Management Subzones* listed in and from the dates specified in Table 14.1, and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA.

Including commercial vegetable production operated as an enterprise across the baseline commercial vegetable growing area where a growing rotation may include multiple land parcels.***

Classification

Restricted Discretionary

Conditions/Standards/Terms

***(a) A nutrient management plan* must be prepared for the land[^], and provided annually to the Regional Council

(b) The activity must be undertaken in accordance with the nutrient management plan* prepared under (a).

(c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss from the activity will not exceed the cumulative nitrogen leaching maximum in Table 14.2A.

(d) A RMP must be prepared in accordance with Schedule X.

Control/Discretion Non-notified

***Discretion is restricted to:

(a) preparation of and compliance with a nutrient management plan* for the land^

(b) good management practices* to avoid, remedy or mitigate nutrient leaching and runoff, faecal contamination and sediment losses from the land^

(c) measures to exclude cattle from wetlands^ and lakes^ that are a rare habitat* or threatened habitat*, and rivers^ that are permanently flowing or have an active bed* width greater than 1 m

(d) the bridging or culverting of rivers^ that are permanently flowing or have an active bed* width greater than 1 m that are crossed by cattle

(e) the matters referred to in the conditions^ of Rules 14-5, 14-6, 14-7, and 14-9(f) (g) the matters referred to in the conditions^ of Rule 14-11 and the matters of control in Rule 14 -11

(g) avoiding, remedying or mitigating the effects of odour, dust, fertiliser* drift or effluent drift (h) provision of information including the annual nutrient management plan*

(i) duration of consent

(j) review of consent conditions^

(k) compliance monitoring

(l) the matters in Policy 14-9***

9 14

NEW RULE 14-2B for Commercial Vegetable Production Activities.

Rule

Rule 14-2B New Vegetable Production Activities exceeding the baseline commercial vegetable production land area.

Activity

The use of land^ pursuant to s9(2) RMA for commercial vegetable growing inside the baseline commercial vegetable growing area and any of the following discharges^ pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming and any ancillary discharge^ of contaminants^ into air pursuant to ss15(1) or 15(2A) RMA.

Classification

Discretionary

Conditions/Standards/Terms

***(a) A nutrient management plan* must be prepared for the land^, and provided annually to the Regional Council.

(b) The activity must be undertaken in accordance plan* prepared under (a)

(c) The nutrient management plan* prepared under (a) must demonstrate that the nitrogen leaching loss from the activity will not exceed the cumulative nitrogen leaching maximum in Table 14.2A. A RMP must be prepared in accordance with Schedule X.***

Control/Discretion Non-notified

Applications which demonstrate mitigation actions in a nutrient management plan and controls in accordance with a Rotation Management Plan which meet the Surface Water Quality Targets in Schedule E will generally be granted as non-notified.

10 14

NEW RULE 14-2C for Commercial Vegetable Production Activities.

Rule

Rule 14-2C New Vegetable Production Activities exceeding the baseline commercial vegetable production land area

Activity

All other uses of land[^] pursuant to s9(2) RMA for commercial vegetable growing, including any of the following discharges[^] pursuant to ss15(1) or 15(2A) RMA associated with that intensive farming and any ancillary discharge[^] of contaminants[^] into air pursuant to ss15(1) or 15(2A) RMA..

Classification

Non-complying

- 11 GL Good management practices refers to evolving practical measures and methods, including those established in industry-based standards, which are used at a sector or community level to ***measure, manage and*** minimise the effects of discharges to land[^] and water[^].
- 12 GL Nutrient management plan means a plan prepared annually in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers' Research Association 2007) which records (including copies of the input and output files of a recognised nutrient management model used to prepare the plan) and takes into account all sources of nutrients for intensive farming and identifies all current and relevant nutrient management practices and mitigations, and which is prepared by a person who has ***been approved by the CEO, Whanganui-Manawatu Regional Council*** [[a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University.]]
- 13 GL NEW DEFINITIONS PROPOSED by submitter
- ***Baseline commercial vegetable growing area means the aggregated area of land utilised for commercial vegetable production at the dates in Table 14.1 and the land is under the control (owned or leased) of a single grower or enterprise; and the area of land which is categorised as LUC Class I and/or Class II in each water management sub-zone.***
- ***Crop rotation - Crop rotation is the systematic planting of different crops in a particular order over several years in the same growing space. This process helps maintain nutrients in the soil, reduce soil erosion, and prevents plant diseases and pests.***
- 14 GEN Consequential changes to Schedule B- Surface Water Management Values.
- There are consequential links between the provisions which are critical to commercial vegetable production on crop rotation systems which require clarification and identification in the plan. These changes apply within the Surface Water Management Value's framework. This requires the following consequential amendments to the values framework:
1. The Domestic Food Supply (DFS) value is changed to reflect the plan provisions to
 - ***a. Commercial Vegetable Production (CVP)***
 2. Commercial Vegetable Production areas redrawn within Fig B:13 on page B-113 as the LUC Class I, Class II and Class III areas inclusive [LRI Map].
 3. The following table B.13 on page B-115, which provides details of the CVP locations is updated to reflect the relief sought above (new map as composed for Fig B:13).
 - a. Table B.13: ***Commercial Vegetable Production (CVP) Value in the Region***.
 - b. Column 5 heading: ***Commercial Vegetable Production Value***
 - c. Entries for Column 5: ***Suitable for vegetable production (including seed production)***
 - d. Part B.3 - Row 3: ***Land and*** Water ***Use***
 - e. Row 3 - sub-row 5
 - i. Column 1: ***CVP***
 - ii. Column 2: ***Commercial Vegetable Production***
 - iii. Column 3: ***The land and water is suitable for commercial vegetable production***
 - iv. Column 4: ***Land-use suitability Class I, Class II and Class III***
- The relief is also able to be provided in visual maps and amended tables.

***Schedule X - Rotation (Commercial Vegetable Production) Management Plan

1. A Nutrient Management Plan shall be prepared in accordance with the requirements of Schedule Y. The Nutrient Management Plan shall be certified as meeting the requirements of Schedule Y by a Certified Farm Environment Planner (commercial vegetable production).
2. The Rotation Plan does not require duplication of material within an existing Nutrient Management Plan that is considered sufficient for purpose by a Certified Farm Environment Planner (commercial vegetable production).
3. Rotation Plans are not required to duplicate material provided to Horizons Regional Council for the purpose of complying with other rules in the plan.
4. Rotation Plans will not be incorporated into consent conditions as a whole; but matters of control or discretion will include relevant actions committed to by the consent holder. The relevant consent holder can alter the farm plan to include new land without altering the consent; if the actions undertaken at the new locations to mitigate environmental effects have the equivalent outcome anticipated within the NMP.
5. The Rotation (Commercial Vegetable Production) Plan shall identify key risk areas for the discharge of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants where practicable.

Part A - Requirements for Rotation (Commercial Vegetable Production) Management Plan

1. The Rotation Plan must clearly identify how any specified consent condition will be complied and shall contain as a minimum:
 - a. The name of the commercial vegetation production (enterprise) as the legal entity registered with the Canterbury Regional Council.
 - b. A description of the enterprise, detailing the general rotational cropping system, properties owned, leased and otherwise farmed on over time within the domain of the rotation.
 - c. A legal description for each parcel of land included in the rotation domain for the enterprise.
 - d. A notification process to Council for changes to the parcels of land in the rotation.
 - e. The Land Use Capability assessment for each of the parcels in the rotation.

Part B - Requirements for a risk assessment for commercial vegetable rotation

2. An assessment of the risk for diffuse discharges of sediment, nitrogen and phosphorus associated with the commercial vegetation production activities on the aggregated area of land used for commercial vegetation production, and the priority of those identified risks, having regard to the freshwater outcomes for Rivers and Lakes in Water Management Subzones and the Region-wide Water Quality Targets in Schedule E.
3. As a minimum, the risk assessment shall include:
 - a. A risk assessment for the precedent nitrogen losses for each of the land parcels in the rotational domain of the Rotational Management Plan;
 - b. A nutrient management plan with demonstrates how any relevant nutrient loss reductions to meet Table 14.2A limits will be achieved;
 - c. The risk assessment should be equivalent to the process outlined in Section 4 of the Horticulture New Zealand Code of Practice for Nutrient Management Version 1.0 August 2014;
 - d. A risk assessment for soil conservation, that is approved by a Certified Farm Environment Planner (commercial vegetable crops) and is equivalent to the process outlined in Section 1 of the Horticulture New Zealand Erosion & Sediment Control Guidelines for Vegetable Production Version 1.1 June 2014;
 - e. Undertake a microbiological discharge risk assessment if animal or animal products are used on the rotation land parcels.
4. If stock are present on land managed within the enterprise, provisions of Schedule Y relating to the farming of animals apply. If stock are present a risk assessment for stock related discharges must be undertaken.
5. A schedule of mitigation actions and target completion dates derived from the risk assessments undertaken in clause 4 and 5 above.
6. The risk assessment data management, reporting and auditing will be consistent with the NZGAP requirements for

vegetable production. Part C Vegetable Growing Minimum Standards

7. Rotation Plans required under Commercial Vegetable Growing Operations Rules shall, in addition to the matters set out above, ensure the following matters are addressed.

1	Nitrogen, Phosphorus	Both (1) and (2) prepared by an appropriately qualified person
2	Nitrogen, Phosphorus	Annual calibration of fertiliser delivering systems through an approved programme such as Spreadmark/Fertspread
3	Soil / Phosphorus	As a minimum by block: an approved erosion and sediment control Plan constructed in accordance with the Erosion and Sediment Control Guidelines for Vegetable Production June 2014
4	Nitrogen, Phosphorus	Documentation available for proof of fertiliser placement according to recommended instruction
5	Nitrogen, Phosphorus	Adoption and use of improved fertiliser products proved effective and available such as formulated prills, coatings and slow release mechanisms
6	Nitrogen, Phosphorus	Evidence available to demonstrate split applications by block/crop following expert approved practice relating to: <ul style="list-style-type: none">- form of fertiliser applied- rate of application- placement of fertiliser- timing of application

No	Contaminant	Vegetable growing minimum standards
1	Nitrogen, Phosphorus	Annual soil testing regime, fertiliser recommendations by block and by crop
2	Nitrogen, Phosphorus	Tailored fertiliser plans by block and by crop

Part C - Requirements for a Rotation Management Plan - The management of contaminants from Commercial Vegetable Growing Operations activities across Water Management sub-zones and new commercial vegetable growing areas.

A Rotation plan (RMP) shall be prepared in accordance with the requirements below.

- 1) The RMP must be certified by a person approved by the Regional Council Chief Executive before an application under Rule 14.2AA and 14.2B can be granted by the Council.
- 2) The RMP must demonstrate for each sub-region and Water Management Sub-Zone how the expected reduction in nutrient discharges to freshwater can be achieved through completing and implementing a farm environment plan action in accordance with Schedule 7. The achievement in reduction of discharges must be comparable when considered over all the properties and parcels managed by the RMP.
- 3) The RMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of resource consent issued under Rule 14.2AA and Rule 14.2B.
- 4) The RMP must be supported by a decision support tool that is able to be utilised as the accounting framework for the relevant enterprise. The decision support tool must:
 - a) Provide measured and predicted data for adaptive management;
 - b) Prioritise actions and review the performance of the commercial vegetable production rotation to meet targets and limits for nutrient management;
 - c) Be capable of integrating with other sub-region, nutrient allocation zone and catchment scale accounting systems;
 - d) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the Rotation Management Plan to a standard approved by a peer review agent approved by the Chief Executive of the Regional Council;
 - e) Provide data to Council for use in assessing compliance with the nutrient loss targets for the relevant nutrient allocation zones in Sections 6 to 15 of the Land and Water Regional Plan
- 5) The RMP must clearly identify how any specified consent conditions will be complied with.***

Submitter Number: 76

**Hokio A Maori Land Trust
45 Queenwood Road**

Vivienne Taueki

Summary of Decision(s) Requested for Submitter Number: 76

Statement#	Topic	Decision Requested
1	GEN	to decline the application for Plan change No.2.

Submitter Number: 78

**Parlato Farming Company
1029 Foxton Shannon Road
R D 13
Foxton**

Tony Parlato

Summary of Decision(s) Requested for Submitter Number: 78

Statement#	Topic	Decision Requested
1	5	<p>o I propose provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.</p> <p>o I strongly support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. I consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.</p> <p>o Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.</p>
2	14	<p>o I propose provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.</p> <p>o I strongly support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. I consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.</p> <p>o Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.</p>
3	14	<p>o I propose provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.</p> <p>o I strongly support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. I consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.</p> <p>o Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.</p>
4	14	<p>o I propose provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.</p> <p>o I strongly support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. I consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.</p> <p>o Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.</p>

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o I strongly support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. I consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.

o Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.

Submitter Number: 79

**Tararua District Council
26 Gordon Street**

Dannevirke

Peter Wimsett

Summary of Decision(s) Requested for Submitter Number: 79

Statement#	Topic	Decision Requested
1	GEN	That the One Plan go into immediate review (Plan Change 3) following the completion of this Plan Change 2 review.
2	GEN	We support an improved/lower cost pathway to obtain a consent. a. To avoid further cost and double up going forward Horizons Regional Council could consider allowing the Farm Plan be aligned with the proposed Freshwater Farm Environment Plan. This can then align with be third party audits. b. Consider that activities under Plan Change 2 be made a controlled activity or a rule created under Plan Change 2 to preclude public notification to ensure that compliance costs are minimised. c. An assessment of environmental effects (AEE) for an individual farmer is costly - Can Horizons Regional consider these be by catchment or groups of farmers in the same district to save repetitive information? Is there a more collaborative approach?
3	GEN	For Horizons Regional Council to consider the Environment Court Decision No [2019] 136 and its implications in respect of Plan Change 2.

Submitter Number: 80

**Carla Marsden
592 Bridge Road
R D 7
Pahiatua**

Summary of Decision(s) Requested for Submitter Number: 80

Statement#	Topic	Decision Requested
1	14	My submission is in support of the Proposed Plan Change 2; table 14,2

Submitter Number: 81

**Jill Sheehy
31 Hinemoa Street**

**Whanganui
4500
Jill Sheehy**

Summary of Decision(s) Requested for Submitter Number: 81

Statement#	Topic	Decision Requested
1	14	<p>Throughout August and September 2019 Tangata Whenua o Whanganui were engrossed in Whanganui Land Settlement Negotiations with the Crown preparing for AIP sign-off and post signing actions. Due to these circumstances and under the RMA Amendment Act 2017 Schedule 1, I wish to request an extension to the submission process please in order for Horizons to:</p> <p>i. Directly engage with Ngā Rūnanga o Te Atihaunui a Paparangi Iwi Authorities, whom whakapapa directly to Te Awa Tupua o Whanganui</p> <p>ii. Commission cultural values and impact assessments for and by Ngā Rūnanga o Te Atihaunui a Paparangi should they desire, with relevant specification to their tupuna rohe; and</p> <p>iii. Assessments to be undertaken at a level of detail that corresponds to the scale and significance of the changes and may include an environmental. social. legal and/or technical assessment of the:</p> <p>A. Te Awa Tupua Act 2017; Wai 671; Whanganui River Water Rights Charter; WDC Ko Ta Whanganui Titiro/Whanganui Hapū/Iwi World View; Ngā Matapono ki te Wai; Stage 2 Report Wai 2358 National Freshwater and Geothermal Resources; The Mauri Model;</p> <p>B. RMA s32 - Evaluation of PPC2; RMA s5, s6, s7, s8, s92; Horizons Social Impact Assessment PPC2 2018; Horizons WMZ 2007; Horizons Chapter 2, 5, 14; Horizons s35 Final report; Horizons FW Evaluation report - October 2016; - through a Tangata Whenua Lens.</p>
2	14	<p>Throughout August and September 2019 Tangata Whenua o Whanganui were engrossed in Whanganui Land Settlement Negotiations with the Crown preparing for AIP sign-off and post signing actions. Due to these circumstances and under the RMA Amendment Act 2017 Schedule 1, I wish to request an extension to the submission process please in order for Horizons to:</p> <p>i. Directly engage with Ngā Rūnanga o Te Atihaunui a Paparangi Iwi Authorities, whom whakapapa directly to Te Awa Tupua o Whanganui</p> <p>ii. Commission cultural values and impact assessments for and by Ngā Rūnanga o Te Atihaunui a Paparangi should they desire, with relevant specification to their tupuna rohe; and</p> <p>iii. Assessments to be undertaken at a level of detail that corresponds to the scale and significance of the changes and may include an environmental. social. legal and/or technical assessment of the:</p> <p>A. Te Awa Tupua Act 2017; Wai 671; Whanganui River Water Rights Charter; WDC Ko Ta Whanganui Titiro/Whanganui Hapū/Iwi World View; Ngā Matapono ki te Wai; Stage 2 Report Wai 2358 National Freshwater and Geothermal Resources; The Mauri Model;</p> <p>B. RMA s32 - Evaluation of PPC2; RMA s5, s6, s7, s8, s92; Horizons Social Impact Assessment PPC2 2018; Horizons WMZ 2007; Horizons Chapter 2, 5, 14; Horizons s35 Final report; Horizons FW Evaluation report - October 2016; - through a Tangata Whenua Lens.</p>
3	14	<p>Throughout August and September 2019 Tangata Whenua o Whanganui were engrossed in Whanganui Land Settlement Negotiations with the Crown preparing for AIP sign-off and post signing actions. Due to these circumstances and under the RMA Amendment Act 2017 Schedule 1, I wish to request an extension to the submission process please in order for Horizons to:</p> <p>i. Directly engage with Ngā Rūnanga o Te Atihaunui a Paparangi Iwi Authorities, whom whakapapa directly to Te Awa Tupua o Whanganui</p> <p>ii. Commission cultural values and impact assessments for and by Ngā Rūnanga o Te Atihaunui a Paparangi should they desire, with relevant specification to their tupuna rohe; and</p> <p>iii. Assessments to be undertaken at a level of detail that corresponds to the scale and significance of the changes and may include an environmental. social. legal and/or technical assessment of the:</p> <p>A. Te Awa Tupua Act 2017; Wai 671; Whanganui River Water Rights Charter; WDC Ko Ta Whanganui Titiro/Whanganui Hapū/Iwi World View; Ngā Matapono ki te Wai; Stage 2 Report Wai 2358 National Freshwater and Geothermal Resources; The Mauri Model;</p>

Geothermal Resources; The Mauri Model;

B. RMA s32 - Evaluation of PPC2; RMA s5, s6, s7, s8, s92; Horizons Social Impact Assessment PPC2 2018; Horizons WMZ 2007; Horizons Chapter 2, 5, 14; Horizons s35 Final report; Horizons FW Evaluation report - October 2016; - through a Tangata Whenua Lens.

4 GEN

Throughout August and September 2019 Tangata Whenua o Whanganui were engrossed in Whanganui Land Settlement Negotiations with the Crown preparing for AIP sign-off and post signing actions. Due to these circumstances and under the RMA Amendment Act 2017 Schedule 1, I wish to request an extension to the submission process please in order for Horizons to:

- i. Directly engage with Ngā Rūnanga o Te Atihaunui a Paparangi Iwi Authorities, whom whakapapa directly to Te Awa Tupua o Whanganui
- ii. Commission cultural values and impact assessments for and by Ngā Rūnanga o Te Atihaunui a Paparangi should they desire, with relevant specification to their tupuna rohe; and
- iii. Assessments to be undertaken at a level of detail that corresponds to the scale and significance of the changes and may include an environmental, social, legal and/or technical assessment of the:

A. Te Awa Tupua Act 2017; Wai 671; Whanganui River Water Rights Charter; WDC Ko Ta Whanganui Titiro/Whanganui Hapū/Iwi World View; Ngā Matapono ki te Wai; Stage 2 Report Wai 2358 National Freshwater and Geothermal Resources; The Mauri Model;

B. RMA s32 - Evaluation of PPC2; RMA s5, s6, s7, s8, s92; Horizons Social Impact Assessment PPC2 2018; Horizons WMZ 2007; Horizons Chapter 2, 5, 14; Horizons s35 Final report; Horizons FW Evaluation report - October 2016; - through a Tangata Whenua Lens.

Submitter Number: 82

**Palmerston North City Council; Manawatū, Horowhenua, Ruapehu and Tararua
District Councils (The Combined Councils)
Private Bag 11034**

**Palmerston North
4442**

Melaina Voss, Wastewater BPO Manager

Summary of Decision(s) Requested for Submitter Number: 82

Statement#	Topic	Decision Requested
1	GEN	<p>PC2 and the One Plan be amended to clarify that the intensive farming provisions of the One Plan including Table 14.2 do not apply to the discharge of treated wastewater to land including where this activity occurs on land used for grazing or in conjunction with other farming or intensive farming activities.</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>
2	GEN	<p>PC2 and the One Plan be amended to include a planning framework of appropriate policies, rules, assessment criteria and other methods to effectively assess applications for the discharge of treated municipal wastewater to land. These provisions should include recognition of the positive effects of changing or partially changing receiving environments from surface water to land for the discharge of treated wastewater and should facilitate applications that seek to change or partially [change?] the receiving environment for treated wastewater discharges from surface water to land.</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>
3	GEN	<p>PC2 and the One Plan should be amended to ensure provisions do not restrict the ability to use land irrigate[d] with treated municipal wastewater for productive purposes.</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>

Submitter Number: 83

**Palmerston North City Council
Private Bag 11034**

**Palmerston North
4442**

Melaina Voss, Wastewater BPO Project

Summary of Decision(s) Requested for Submitter Number: 83

Statement#	Topic	Decision Requested
1	GEN	<p>PC2 and the One Plan be amended to clarify that the intensive farming provisions of the One Plan including Table 14.2 do not apply to the discharge of treated wastewater to land including where this activity occurs on land used for grazing or in conjunction with other farming or intensive farming activities.</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>
2	GEN	<p>PC2 and the One Plan should be amended to ensure provisions do not restrict the ability to use land irrigate with treated municipal wastewater for productive purposes.</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>
3	GEN	<p>PC2 and the One Plan be amended to include a planning framework of appropriate policies and methods to effectively assess and provide support for applications for the discharge of treated municipal wastewater to land. These provisions should include recognition of the positive effects of changing or partially changing receiving environments from surface water to land for the discharge of treated wastewater.</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>
4	5	<p>Amend Policy 5-8:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Policy 5-8: Management and Regulation of intensive farming land" use activities affecting groundwater and surface water" quality ***In order to give effect to Policy 5-7, the effects of intensive farming land" use activities on groundwater and surface water" quality must be managed in the following manner:*** (a) Nutrients (i) Nitrogen leaching maximums must be established in the regional plan which: (A) take into account all the non-point sources of nitrogen in the catchment ***except discharges of treated municipal wastewater irrigated to land including the discharge of treated municipal wastewater irrigated to land carried out in conjunction with intensive farming land use activities***</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>
5	14	<p>Amend Policy 14-5:</p> <p>[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]</p> <p>Policy 14-5: Management of intensive farming land" uses In order to give effect to Policy 5-7 and Policy 5-8, intensive farming land" use activities affecting groundwater and surface water" quality must be managed in the following manner: (a) The following land uses have been identified as intensive farming land" uses: (i) Dairy farming* (ii) Commercial vegetable growing* (iii) Cropping* (iv) Intensive sheep and beef* *** (aa) The following land uses are not intensive farming land" use activities (i) The discharge of treated municipal wastewater irrigated to land undertaken in conjunction with the land uses identified in (a)(i) to (iv); and (ii) The discharge of treated municipal wastewater irrigated to land undertaken in conjunction with any other farming land use activity***</p> <p>Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.</p>

6 14

Amend section 14.3:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

14.3 Rules - Agricultural Activities

***The following land uses are not intensive farming land" use activities and are not subject to the nitrogen leaching maximums set out in Table 14.2 or to Rules 14.1 to 14.2A.

(j) The discharge of treated municipal wastewater irrigated to land undertaken in conjunction with the land uses identified in Policy 14.5(a)(ii to (iv); and

(iii) The discharge of treated municipal wastewater irrigated to land undertaken in conjunction with any other farming land use activity

Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.

7 14

Insert new Policy 14-2A:

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Policy 14-2A: Consent decision-making for discharges" of treated municipal wastewater to land"

When making decisions on resource consent^ applications, and setting consent conditions^, for discharges^ of treated municipal wastewater onto, into or over land^ the Regional Council must have regard to:

(a) the objectives and policies of Chapter 5 regarding the management of groundwater quality and discharges^;

(b) the benefits derived from having a discharge of treated municipal to land rather than to surface water

(c) where the discharge^ may enter surface water^ or have an adverse effect^ on surface water^ quality, the degree of compliance with the approach for managing surface water^ quality set out in Chapter 5 and in particular the improvements that the discharge of treated municipal wastewater to

land makes to the quality of surface water;

(d) the extent to which adverse effects/\ on any sensitive receiving environments^ or potentially incompatible land^ uses, in particular any residential buildings, educational facilities, churches, marae, public areas, infrastructure^ and other physical resources of regional or national importance

identified in Policy 3-1, wetlands^, surface water bodies^ and the coastal marine area^ can be mitigated.

(e) the objectives and policies of Chapters 2, 3, 6, 9 and 12 to the extent that they are relevant to the discharge^.

(f) any adverse or positive effects on public health;

(g) any offensive or objectionable odour effects beyond the property* boundary;

(h) the adequacy of any proposed buffers to mitigate effects on adjoining properties and in particular on any sensitive receiving environments^ or potentially incompatible land^ uses identified in (d) above.

(i) the extent to which any adverse effects of the discharge on:

(i) groundwater at any point of abstraction utilised for irrigation, stock or domestic drinking water^;

(iii) stormwater drains; or

(iv) artificial watercourses*;

can be mitigated

Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.

8 GL

Amend definition of 'Biosolids':

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Biosolids means a sewage or sewage sludge, derived from a sewage treatment plant, that does not include animal effluent* or products derived from industrial wastewater treatment plants, and that has been treated or stabilised to the extent that it is able to be safely and beneficially applied to land^ ***but excludes treated municipal wastewater***.

Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.

9 GL

Amend definition of 'fertiliser':

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Fertiliser means any substance or mix of substances that is described as or held to be suitable for sustaining or increasing the growth, productivity or quality of plants (or animals indirectly) through the application to plants and soils of:

(a) the following major nutrients: nitrogen, phosphorus, potassium, sulphur, magnesium, calcium, chloride and sodium

(b) the following minor nutrients: manganese, iron, zinc, copper, boron, cobalt, molybdenum, iodine and selenium

(c) non-nutrient attributes of the materials used in fertiliser

(d) fertiliser additives

(e) gypsum and lime

but does not include biosolids*, animal effluent*, compost* or poultry farm litter* or pig farm litter* ***or treated municipal wastewater***.

Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.

10 GL

Amend definition of 'Intensive sheep and beef farming':

[Note: text inside double brackets is strikethrough to signify text sought to be deleted; text between the ***s is underline to signify text sought to be added.]

Intensive sheep and beef farming refers to properties greater than 4 ha engaged in the farming of sheep and cattle, where any of the land grazed is irrigated ***but excludes any land irrigated with treated municipal wastewater***.

Any alternative, consequential or additional relief, to that set out in this submission, required to give effect to the matters raised generally in this submission.

Submitter Number: 84

**Tamarangi Hapu of Muaupoko
45 Queenwood Road**

Vivienne Taueki

Summary of Decision(s) Requested for Submitter Number: 84

Statement#	Topic	Decision Requested
1	GEN	As per Hokio A trust submission [refer submission no. 76]

Submitter Number: 85

**Te Mauri o Rangitāne o Manawatū;
Tanenuiarangi Manawatū Incorporated (Iwi Authority)
P O Box 1341**

Palmerston North

Siobahn Lynch-Karaitiana

Summary of Decision(s) Requested for Submitter Number: 85

Statement#	Topic	Decision Requested
1	GEN	[Note Late Submission]

Rangitāne o Manawatū require a setback for biosolids discharge relevant to the size, importance and definition of the wahi tapu in question.

2	GEN	[Note: Late Submission]
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Without the ability to undertake a Cultural Impact Assessment Rangitāne o Manawatū do not have the opportunity to understand the scope of the proposal and comment on how the Plan Change will impact on the wider iwis ability to provide for their cultural, spiritual, social and economic wellbeing. It is recommended that this work be commissioned to inform Plan Change 2 immediately.

Submitter Number: 87

**Manawatū District Council
Private Bag 10 001**

**Feilding
4743
Dr Richard Templer**

Summary of Decision(s) Requested for Submitter Number: 87

Statement#	Topic	Decision Requested
1	GL	<p>That the grazing of land that receives treated wastewater from a wastewater treatment plant be specifically excluded from the list of "intensive farming land uses" under Policy 14-5(a) of Proposed Plan Change 2; or</p> <p>That a new definition of "irrigation" be added to the One Plan that refers to the irrigation of groundwater or surface water but does not include the disposal of treated wastewater.</p> <p>That an explanatory note be added beneath Policy 14-5(a) or the new definition of "irrigation" depending on which approach is preferred, explaining why the irrigation of treated wastewater is considered differently to other irrigation. Possible wording for this advice note is as follows: "Explanatory Note: The purpose of discharging treated wastewater from wastewater treatment plants to land is to reduce direct discharges to waterways, thereby improving water quality. This differs from the irrigation of groundwater or surface water to land, which is primarily for the purpose of increasing the productive potential of the land. It is therefore appropriate that the irrigation of treated wastewater to be treated differently from other irrigation."</p>
2	GEN	<p>One Plan and Proposed Plan Change 2 be amended to include provisions that:</p> <p>a) facilitate the discharge of treated wastewater to land, and enable the receiving land to be used for productive / intensive farming land use activities; and</p> <p>b) remove any requirements for the need to obtain additional resource consents where the discharge of treated wastewater will be undertaken in combination with productive / intensive farming land use activities</p>
3	GL	<p>That the definition of "Good management practices" be amended as follows:</p> <p>Good management practices refers to evolving practical measures and methods, including those established in industry-based standards, which are used at a sector or community level to minimise the effects of discharges to land and water.</p>