

**FURTHER SUBMISSION ON
PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 AND VARIATION 1
TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPA
CATCHMENTS**

TO: Waikato Regional Council
Via email: healthyrivers@waikatoregion.govt.nz

SUBMITTER: Ravensdown Limited (Submitter ID 74058)

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1. This is a further submission on the Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchments and Variation 1 to the Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchments, hereafter referred to as '**PPC1 and Variation 1**'. The specific submissions supported or opposed and the reasons for the support or opposition are contained in the table provided in **Attachment A**.
2. Ravensdown Limited (**Ravensdown**) is an organisation that has an interest in PPC1 and Variation 1 that is greater than the general public has.
3. Ravensdown wishes to be heard in support of this further submission.
4. Ravensdown would be prepared to consider presenting its submission(s) in a joint case with others making a similar submission at any hearing.

Date: 17 September 2018



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Carmen Taylor

Consultant Planner

Authorised to sign this further submission on behalf of Ravensdown Limited

ATTACHMENT A – RAVENSDOWN LIMITED’S FURTHER SUBMISSIONS ON THE PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPA RIVER CATCHMENTS AND VARIATION 1 TO THE PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPA RIVER CATCHMENTS

REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchments							
1	Auckland/Waikato Fish & Game and Eastern Region Fish & Game (Fish & Game) (Sub. ID 74085) (Contact email: bwilson@fishandgame.org.nz)	PC1-11007 (p.5 – Vol. 1 by Prov. Order)	General	The submitter requests the inclusion of a new schedule, and associated amendments to PPC1, referred to as ‘Schedule E – Nitrogen Loads Limits and Targets by Sub-catchment’. The proposed schedule proposes a 30% reduction throughout Priority 1 to 3 sub-catchments to achieve the short term targets in Table 3.11-2. The remainder of the proposed schedule is not populated, with the submitter noting that it would be fully populated during further submissions.	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included the 10% change towards the long term water quality improvements as indicated by the short term water quality attribute targets (Objective 2). Ravensdown therefore considers the proposed new schedule is not appropriate or necessary as it does not reflect the resource management approach provided for by PPC1.	Reject submission
2	Fertiliser Association of New Zealand (FANZ) (Sub. ID 73305) (Contact email: greg@fertiliser.org.nz)	PC1-11168 (p.25 – Vol. 1 by Prov. Order)	General	The submitter requests that where ‘reduce diffuse discharge’ is referred to throughout PPC1 with reference to contaminants in the context of the intent to ‘reduce losses to water’, the terms ‘losses’ or ‘losses to water’ should be used.	Support	Ravensdown considers that the proposed amendments will provide clarity within PPC1.	Accept submission
3	Wairakei Pastoral Ltd (Sub. ID 74095) (Contact email: daya.winterbottom@xtra.co.nz)	PC1-11406 (p.81 – Vol. 1 by Prov. Order)	General	The submitter requests the inclusion of new Schedules 2 to 4 relating to ‘Requirements for a Sub-catchment Management Plan’, ‘Adaptive Management Approach’ and ‘Farm Mitigations for Catchment Management’ respectively. The	Oppose	Ravensdown in its submission supported the overall intent and approach adopted in PPC1. While it is possible that the proposed concepts reflected in this submission may be of assistance in achieving the	Reject submission

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Ravensdown Limited – Submitter ID 74058 (17 September 2018)

REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
				submitter identifies that the proposed new schedules, and associated amendments requested throughout its submission, are based on an adaptive management and mitigation approach that will provide for both short term and long term improvements in water quality at both an enterprise and sub-catchment level.		water quality vision for the Waikato and Waipa catchments, particularly in the long term (rather than the short term which is the initial focus of PPC1), it is considered that they are overly complicated and will create difficulties in terms of implementation.	
4	GBC Winstone (Sub. ID 73992) (Contact email: dan.mcgregor@gbcwinstone.co.nz)	PC1-3590 (p.88 – Vol. 1 by Prov. Order)	Areas covered by Chapter 3.11	The submitter requests amendments to the paragraph below the bullet points. The requested amendments aim to clarify that FMUs will enable monitoring of the freshwater objectives, developed to give effect to the National Policy Statement for Freshwater Management (NPSFM), and long term desired water quality states that have been developed to give effect to the Vision and Strategy targets and limits (i.e., rather than just monitoring of progress towards meeting targets and limits).	Support	Ravensdown considers that the proposed amendments more clearly articulate the role that the FMUs, and associated provisions of the PPC1, will play in giving effect to both the NPSFM and the Vision and Strategy.	Accept submission
5	Oil Companies (Sub. ID 73716) (Contact email: dlemarquand@burtonconsultants.co.nz and jmccall@burtonconsultants.co.nz)	PC1-2586 (p.88 – Vol. 1 by Prov. Order)	Areas covered by Chapter 3.11	The submitter requests a number of amendment options with the aim of intending to clarify that the policy framework, particularly Policies 10 to 13, is targeted only to the rural environment/farming activities.	Oppose	The objectives and policies of PPC1 aim to give effect to the Vision and Strategy for the Waikato and Waipa catchments, which includes the long term restoration and protection of water quality. While the regulatory framework of PPC1 relates to specific primary production activities, PPC1's objectives and policies cover the	Reject submission

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
						range of activities that have the potential to affect water quality, both in the short and long term timeframes outlined within PPC1.	
6	Fonterra Co-operative Group Ltd (Fonterra) (Sub. ID 74057) (Contact email: richard.allen2@fonterra.com)	PC1-11254 (p.89 – Vol. 1 by Prov. Order)	Areas covered by Chapter 3.11	The submitter requests a number of amendments to ensure that the definitions and terms of the NPSFM are applied consistently, where relevant, throughout PPC1.	Support	Ravensdown considers, where it is relevant to do so, that PPC1 should be consistent with the terminology used within the NPSFM.	Accept submission
7	FANZ (Sub. ID 73305)	PC1-9698 (p.92 – Vol. 1 by Prov. Order)	Background and explanation	The submitter requests the retention of the overall principles contained in the 'Background and explanation' section of PPC1.	Support	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. Therefore, the principles, as articulated in the 'Background and explanation' reflect this intent and the approach.	Accept submission
8	AFFCO New Zealand Limited (AFFCO) (Sub. ID 74140) (Contact email: gvenus@argoenv.com)	PC1-7666 (p.98 – Vol. 1 by Prov. Order)	Full achievement of the Vision and Strategy will be intergenerational	The submitter requests that terms 'best management practice' and 'good management practice', which are used within PPC1, are replaced with the term 'best practicable option'.	Oppose	The concept of 'good management practice' is an approach accepted and adopted throughout New Zealand in statutory planning documents, particularly in relation to primary production activities. Good management practice documents include the September 2015 'Industry-agreed Good Management Practices relating to Water Quality' and 'The Good Farming Practice: Action Plan for Water Quality' released jointly in June 2018 by primary sector groups, regional	Reject submission

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
						councils and the Ministries for the Environment and Primary Industries. Ravensdown considers, consistent with national approaches, that the reliance on 'good management practice' within PPC1 should be retained.	
9	Waikato Regional Council (Waikato RC) (Sub. ID 74095) (Contact email: andrew.testers@waikato.govt.nz)	PC1-2980 (p.107 – Vol. 1 by Prov. Order)	Full achievement of the Vision and Strategy will be intergenerational	The submitter requests a number of minor amendments to the 'Background and explanation' to PPC1 to address minor inconsistencies.	Support	Ravensdown considers that amendments to address inconsistencies, particularly in relation to the terminology used within PPC1 and Variation 1, is appropriate.	Accept submission
10	Fish & Game (Sub. ID 74085)	PC1-10768 (p.116 – Vol. 1 by Prov. Order)	Intrinsic values – Ecosystem health	The submitted request the inclusion of the following bullet point: <i>Freshwater standards are set to achieve ecosystem health.</i>	Oppose	Ravensdown considers that the requested addition is not consistent with identifying values associated with ecosystem health.	Reject submission
11	Department of Conservation (DOC) (Sub. ID 71759) (Contact email: gwhite@doc.govt.nz and dspeirs@doc.govt.nz)	PC1-8139 (p.116 – Vol. 1 by Prov. Order)	Intrinsic values – Ecosystem health	The submitter requests an expanded list of matters that reflect the intrinsic values that contribute to ecosystem health.	Oppose	Ravensdown considers that the additional matters requested by the submitter are appropriately and effectively provided for by the matters already identified in PPC1. In addition, many of the new matters requested are not consistent with identifying values (e.g., protecting and restoring shallow lakes so they are dominated by submerged native aquatic plants).	Reject submission

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
12	DOC (Sub. ID 71759)	PC1-8152 (p.117 – Vol. 1 by Prov. Order)	Intrinsic values – Natural form and character	The submitter requests an expanded list of matters that reflect the intrinsic values that contribute to ecosystem health.	Oppose	As noted above in relation to 'Point ID PC1-8139', Ravensdown considers that the additional matters requested by the submitter are appropriately and effectively provided for by the matters already identified in PPC1. In addition, many of the new matters requested are not consistent with identifying values associated with the natural form and character of freshwater bodies.	Reject submission
13	Fish & Game (Sub. ID 74085)	PC1-10790 (p.127 – Vol. 1 by Prov. Order)	3.11.2 Objectives	The submitter requests two objectives that specifically relate to: the restoration and protection of ecosystem health; and, the classification, maintenance and enhancement of significant wetlands.	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included, subject to some amendments, the suite of objectives. Ravensdown therefore considers that additional objectives, as proposed by the submitter, are not necessary.	Reject submission
14	Beef + Lamb New Zealand Limited (Beef + Lamb) (Sub. ID 73369) (Contact email: corina.jordan@beeflambnz.com)	PC1-11150 (p.127 – Vol. 1 by Prov. Order)	3.11.2 Objectives	The submitter requests amendments to and/or a number of new objectives that traverse of range of matters.	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included, subject to some amendments, the suite of objectives. Ravensdown therefore considers that the additional objectives, as proposed by the submitter, are not necessary.	Reject submission
15	DOC	PC1-10521 (p.128 –	3.11.2	The submitter requests a number of new objectives that specifically	Oppose	Ravensdown, in its submission, supported the overall intent and	Reject

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
	(Sub. ID 71759)	Vol. 1 by Prov. Order)	Objectives	relate to: safeguarding ecosystem health and the health of indigenous species; recognising and providing for the values of freshwater fish species; the significant values of wetlands including the Whangamarino Wetland; and, that recognises that all sediment and nutrients accumulate in the Waikato Estuary and in this light seek the restoration of healthy ecosystems from the mountains to the sea.		approach adopted within PPC1. This included, subject to some amendments, the suite of objectives. Ravensdown therefore considers that additional objectives, as proposed by the submitter, are not necessary.	submission
16	Hancock Forest Management (NZ) Ltd (Hancock Forest) (Sub. ID 73724) (Contact email: sstrang@hnrg.com)	PC1-5368 (p.130 – Vol. 1 by Prov. Order)	3.11.2 Objectives	The submitter requests a new objective that aims to manage discharges that affect groundwater and surface water by a range of matters as listed in parts (a) to (d).	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included, subject to some amendments, the suite of objectives. Ravensdown therefore considers the proposed additional objective, as proposed by the submitter, is not necessary.	Reject submission
17	Oji Fibre Solutions (NZ) Ltd (Oji Fibre) (Sub. ID 73724) (Contact email: gkchappell@xtra.co.nz)	PC1-6364 (p.133 – Vol. 1 by Prov. Order)	3.11.2 Objectives	The submitter requests a new objective that aims to manage discharges that affect groundwater and surface water by a range of matters as listed in parts (a) to (d).	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included, subject to some amendments, the suite of objectives. Ravensdown therefore considers the additional objective, as proposed by the submitter, is not necessary.	Reject submission
18	Beef + Lamb (Sub. ID 73369)	PC1-11154 (p.139 – Vol. 1 by	Objective 1	The submitter requests two new objectives that relate to: safeguarding and managing surface	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This	Reject submission

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
		Prov. Order)		water bodies and recognises and provides for their values; and, managing land and water resources as part of a targeted and risk based sub-catchment approach.		included, subject to some amendments, the suite of objectives. Ravensdown therefore considers that the additional objective, as proposed by the submitter, are not necessary.	
19	Pukekohe Vegetable Growers Association Inc. (PVGA) (Sub. ID 74220) (Contact email: secretary@pvga.org.nz)	PC1-7780 (p.105 – Vol. 2 by Prov. Order)	Policy 3	The submitter, amongst a number of points in relation to this, requests the deletion of part (b) which caps the area of land in the region that can be used for commercial vegetable production to the maximum area in production in any property or enterprise during the 10 years up to 2016. The submitter also requests more land use flexibility.	Support in part	Ravensdown considers that the potential restriction on land use flexibility for this activity, an activity which produces food to feed people and which is under pressure due to urban growth, in the context of the other tools and regulatory mechanisms incorporated into PPC1 does not necessarily provide for the sustainable management of the region's resources in accordance with section 5 of the RMA.	Accept submission in relation to providing for land use flexibility
20	FANZ (Sub. ID 73305)	PC1-9800 (p.23 – Vol. 3 by Prov. Order)	Policy 14	Policy 14 aims to restore and protect lakes within the Waikato and Waipa catchments by 2096 by implementing lake specific approaches in accordance with Lake Catchment Plans. The submitter supports the staged and lake specific approach, but requested amendments to clarification that restoration, rather than protection, would only be required if lakes are degraded.	Support	Ravensdown considers that the restoration of degraded lakes, and thus protection of un-degraded lakes (i.e., so they do not become degraded), is an appropriate resource management response.	Accept submission
21	Fish & Game	PC1-10910 (p.42 –	3.11.4 Implement-	The submitter requests a new method that outlines a process for	Oppose	Ravensdown, in its submission, supported the overall intent and	Reject

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
	(Sub. ID 74085)	Vol. 3 by Prov. Order)	ation methods	initiating an allocation for diffuse discharges.		<p>approach adopted within PPC1. This included the proposed approach to reducing diffuse discharges from farming activities, as outlined in Policy 3, and developed through the rules and schedules in PPC1.</p> <p>Ravensdown therefore considers the proposed additional method, as proposed by the submitter, is not necessary.</p>	submission
22	DairyNZ (Sub. ID 74050) (Contact email: justine.young@dairy.nz.co.nz)	PC1-10239 (p.42 – Vol. 3 by Prov. Order)	3.11.4 Implementation methods	The submitter requests a new method that requires research and dissemination of edge of field mitigations that reduce diffuse contaminants. The resultant guideline will provide assistance to Certified Farm Environment Planners.	Support	Ravensdown considers that such a tool will be of assistance to all parties involved in the implementation of PPC1.	Accept submission
23	FANZ (Sub. ID 73305)	PC1-9831 (p.66 – Vol. 3 by Prov. Order)	Method 3.11.4.3	<p>Method 3.11.4.3 identifies that Farm Environment Plans, which are to be developed, certified and monitored, are to be used as a tool for the reduction of diffuse discharges of the contaminants of interest addressed within PPC1.</p> <p>The submitter supports the intent of the method but requests that Council engages in the nationally consistent certification process and does not create duplication or conflict by introducing a region</p>	Support	<p>Ravensdown shares similar concerns to those expressed by FANZ in its submission.</p> <p>Ravensdown considers that the certification of Farm Environment Plans, and other certification processes included in PPC1, should be carried in accordance with already established national processes. Creating new regional systems have the potential to create confusion and conflict, as well as unnecessary duplication.</p>	Accept submission

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
				specific certification process.			
24	DairyNZ (Sub. ID 74050)	PC1-10241 (p.110 – Vol. 3 by Prov. Order)	Method 3.11.4.8	Method 3.11.4.8 overviews the methods that Council will use to review Chapter 3.11 and develop an allocation framework for the next Regional Plan. The submitter requests that rather than referring to an ‘allocation framework’ that the method should refer to ‘options to reduce discharges’. This approach leaves room for a range of options to be considered in the future, rather than tying Council to an allocation framework which in future may not be the best outcome in terms of achieving sustainable management.	Support	Ravensdown considers that the matters raised by the submitter are valid and that the proposed amendments have value.	Accept submission
25	Horticulture New Zealand (HortNZ) (Sub. ID 7473801) (Contact email: astra.foster@hortnz.co.nz)	PC1-10112 (p.116 – Vol. 3 by Prov. Order)	Method 3.11.4.9	Method 3.4.11.9 overviews the methods that Council will use to manage the effects of urban development. The submitter requests additions to this method that aim to provide further assessment and recognition of the potential adverse effects on the catchment’s water quality arising from urban environments.	Support	Ravensdown considers that over the long term timeframes accommodated within PPC1, it will be important to ensure that all potential water quality contamination sources are recognised, understood and where necessary, managed. This includes the contribution that the urban environment may play in degrading water quality.	Accept submission
26	FANZ (Sub. ID 73305)	PC1-10613 (p.129 – Vol. 3 by Prov. Order)	Method 3.11.4.11	Method 3.11.4.11 overviews the methods to be adopted by Council to monitor and evaluate the implementation of Chapter 3.11 of	Support	Ravensdown considers that the monitoring and evaluation of the effectiveness of PPC1 is important, particularly in the context of the	Accept submission

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		Order)		the Waikato Regional Plan. The submitter supports the general intent of this method and requests its retention.		longer term water quality goals for the Waikato and Waipa catchments.	
27	Fish & Game (Sub. ID 74085)	PC1-10998 (p.6 – Vol. 4 by Prov. Order)	Rule 3.11.5.3	Rule 3.11.5.3 provides for farming activities with a Farm Environment Plan under a Certified Industry Scheme as a permitted activity. The submitter requests the deletion of this rule.	Oppose	Ravensdown, in its submission, requested the retention of this rule (subject to amendments in relation to a nationally consistent certification scheme). Therefore, Ravensdown opposes the deletion of this rule.	Reject submission
28	The Royal Forest & Bird Protection Society of New Zealand Incorporated (Forest & Bird) (Sub. ID 74122) (Contact email: i.miller@forestandbird.org.nz)	PC1-8427 (p.66 – Vol. 4 by Prov. Order)	Rule 3.11.5.3	Rule 3.11.5.3 provides for farming activities with a Farm Environment Plan under a Certified Industry Scheme as a permitted activity. The submitter requests the deletion of this rule.	Oppose	Ravensdown, in its submission, requested the retention of this rule (subject to amendments in relation to a nationally consistent certification scheme). Therefore, Ravensdown opposes the deletion of this rule.	Reject submission
29	Fish & Game (Sub. ID 74085)	PC1-10999 (p.82 – Vol. 4 by Prov. Order)	Rule 3.11.5.4	Rule 3.11.5.4 provides for farming activities with a Farm Environment Plan not under a Certified Industry Scheme as a controlled activity. The submitter requests a number of amendments to this rule, including, but not limited to: removing references to Certified Industry Scheme as result of the submitters request to delete Rule 3.11.5.3; the	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included, subject to some amendments, the use of the Nitrogen Reference Point and OVERSEER®. In addition, a rule hierarchy whereby farming activities have the opportunity to comply with a permitted activity rule, subject to meeting specific requirements is	Reject submission

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				requirement to meet the proposed nitrogen discharge targets and timeframes in the submitters proposed Schedule E (Point ID PC1-11007 as provided above); and, removal of the Nitrogen Reference Point and OVERSEER® as tools to be used.		supported. The amendments proposed by the submitter, given the submission on Rule 3.11.5.3 (Point ID PC1-10998), would result in all farming activities, except for those provided for by Rule 3.11.5.2, being required to seek resource consents even if they have Farm Environment Plans in place to manage and mitigate the effects of their operations. Ravensdown does not support this approach.	
30	Fish & Game (Sub. ID 74085)	PC1-11001 (p.191 – Vol. 4 by Prov. Order)	Rule 3.11.5.6	<p>Rule 3.11.5.6 provides for the use of land for farming, that does not comply with Rules 3.11.5.1 to 3.11.5.5 as a restricted discretionary activity. Applications in accordance with this rule would not be subject to limited or public notification and written approvals would not be required.</p> <p>The submitter requests, amongst other matters, that the activity status of this rule be amended to a non-complying activity, and that such applications will be subject to limited or public notification.</p>	Oppose	<p>Ravensdown, in its submission, requested the retention of this rule. Therefore, Ravensdown opposes the proposed change in activity status and the change to notification requirements.</p> <p>While non-complying activity status for land use change (Rule 3.11.5.7) in the region is considered to be appropriate in terms of the rule hierarchy established within PPC1, non-complying activity status for the continued use of land for existing farming activities in the region is not appropriate.</p> <p>Limited or public notification of resource consents for these activities is also not considered appropriate, particularly in the context of the presumption now contained in the</p>	Reject submission

REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
						RMA not to notify.	
31	Forest & Bird (Sub. ID 74122)	PC1-13115 (p.220 – Vol. 4 by Prov. Order)	Rule 3.11.5.6	<p>Rule 3.11.5.6 provides for the use of land for farming, that does not comply with Rules 3.11.5.1 to 3.11.5.5 as a restricted discretionary activity. Applications in accordance with this rule would not be subject to limited or public notification and written approvals would not be required.</p> <p>The submitter requests, amongst other matters, that the activities that do not comply with Rules 3.11.5.2(a) and (4) be amended to a non-complying activity, and that applications under Rule 3.11.5.6 will be subject to limited or public notification.</p>	Oppose	<p>Ravensdown, in its submission, requested the retention of this rule. Therefore, Ravensdown opposes the proposed change in activity status and the change to notification requirements.</p> <p>While non-complying activity status for land use change (Rule 3.11.5.7) in the region is considered to be appropriate in terms of the rule hierarchy established within PPC1, non-complying activity status for the continued use of land for existing farming activities in the region is not appropriate.</p> <p>Limited or public notification of resource consents for these activities is also not considered appropriate, particularly in the context of the presumption now contained in the RMA not to notify.</p>	Reject submission
32	DairyNZ (Sub. ID 74050)	PC1-10247 (p.238 – Vol. 4 by Prov. Order)	Rule 3.11.5.7	<p>Rule 3.11.5.7 provides for land use change as a non-complying activity.</p> <p>The submitter requests that the following advice note be attached to the rule:</p> <p><i>Changes in land use described above where the resulting land use will not increase diffuse discharges of contaminants, (including that</i></p>	Support	<p>Ravensdown considers that the proposed advice note provides appropriate clarity around the nature of farming activities that would not necessarily be restricted from establishing in the region under this rule. (i.e., those that do not increase contaminants levels from diffuse discharges).</p>	Accept submission

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				<i>they do not exceed the property or enterprise's Nitrogen Reference Point), will generally be granted. This will be able to be established at the time that the farm or enterprise has completed a Farm Environment Plan and are managing within their Nitrogen Reference Point.</i>			
33	Beef + Lamb (Sub. ID 73369)	PC1-11506 (p.301 – Vol. 4 by Prov. Order)	Schedule B – Nitrogen Reference Point	The submitter requests a number of refinements to this schedule. These include, but are not limited to, ensuring that the schedule is consistent and uses the 'Best Practice Data Input Standards' for the OVERSEER® Model and that Certified Nutrient Management Advisors are referred to rather than Certified Farm Nutrient Adviser. These are the terms and tools adopted nationally throughout New Zealand.	Support	The submitter's request, in relation to the two matters discussed in this further submission, is consistent with Ravensdown's submission.	Accept submission in relation to the two matters identified in this further submission
34	Oji Fibre (Sub. ID 73724)	PC1-8743 (p.339 – Vol. 4 by Prov. Order)	Schedule B – Nitrogen Reference Point	The submitter requests the deletion of this schedule as it has proposed an alternative approach throughout its submission. The alternative approach regulates land use on the basis of best practicable option which entails the use of a land use suitability approach using sub-catchment information.	Oppose	Ravensdown, in its submission, supported the overall intent and approach adopted within PPC1. This included, subject to some amendments, the use of the Nitrogen Reference Point and OVERSEER®. Therefore, Ravensdown opposes the deletion of this schedule.	Reject submission seeking the deletion of Schedule B
35	Forest & Bird	PC1-8451	Schedule B –	The submitter requests that	Oppose	Ravensdown considers that the	Reject

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REF.	SUBMITTER	POINT ID	PLAN PROVISION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
	(Sub. ID 74122)	(p.359 – Vol. 4 by Prov. Order)	Nitrogen Reference Point	Schedule B(b) be amended to refer to the average annual nitrogen loss, not the highest.		proposed amendment, depending on what the submitter is aiming to achieve, will either further complicate the implementation of PPC1 (i.e., compliance will also need to be based on an average of the discharges, not the total) or half the Nitrogen Reference Point that will apply to each property.	submission
36	Waikato RC (Sub. ID 74095)	PC1-3666 (p.203 – Vol. 5 by Prov. Order)	New definition – Current version of OVERSEER®	The submitter requests the inclusion of the following new definition: <i>Current version of OVERSEER® is the version of the OVERSEER® model with the most recent release date.</i>	Support	The inclusion of the proposed definition clarifies that all references to OVERSEER® in PPC1 and Variation 1 means the most recent version. This approach avoids the issue of having to follow a Schedule 1 process to change the regional plan if the plan refers to a specific version of OVERSEER®, which is subsequently replaced by a new version.	Accept submission
37	Waikato RC (Sub. ID 74095)	PC1-3664 (p.205 – Vol. 5 by Prov. Order)	Definition – 75 th percentile nitrogen leaching value	The submitter requests amendments to the definition to clarify the method for calculating the 75 th percentile. The requested changes include stating the calculation will be undertaken once at a single point in time and will be established for the four riverine FMUs and any lake catchment within a riverine FMU.	Support	Ravensdown considers that the amendments proposed will provide the necessary clarity. In addition, ensuring the 75 th percentile is taken at a single point in time is considered appropriate.	Accept submission