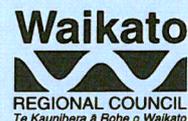


FURTHER SUBMISSION FORM

IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION/S ON NOTIFIED:



PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS

Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

Council needs to receive your further submission by 5pm, Monday, 17 September 2018. Please read the notes on making a Further Submission at the end of this form before completing your submission.

IMPORTANT NOTE

A copy of your further submission must be served on the original submitter/s within 5 working days of being lodged with council. An address list of all submitters is included with the summary of decisions requested documents and is available at waikatoregion.govt.nz/healthyivers

YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of submitter (individual/organisation)	SOUTH WAIKATO DISTRICT COUNCIL	
Contact person (if applicable)	Sharon Robinson - Group Manager Regulatory	
Agent (if applicable)		
Email address for service	sharon.robinson@southwaikato.govt.nz	
Postal address for service	Private Bag 7	
	Tokoroa	
	Post code: 3444	
Phone number/s	Home:	Business: 07 8850340
	Mobile: 0272073988	Fax: 078850718

IN ACCORDANCE WITH SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT:

I am:

- A person representing a relevant aspect of the public interest.
In this case, also specify the grounds for saying that you come within this category; or
- A person who has an interest in the proposal that is greater than the interest the general public has.
In this case, also explain the grounds for saying that you come within this category; or
- The local authority for the relevant area.

My reasons are (i.e. grounds for selection above):

This further submission is on behalf of the South Waikato District Council

PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my further submission.
 No, I do not wish to speak at the hearing in support of my further submission.

JOINT SUBMISSION

- If others make a similar submission, please tick this box if you would consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached 87 extra sheets. No, I have not attached extra sheets.

SIGNATURE - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed  Date 13/9/18
Type name if submitting electronically Craig Hobbs, Chief Executive

FURTHER SUBMISSIONS CAN BE SENT BY



Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240



Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton



(07) 859 0998



healthyrivers@waikatoregion.govt.nz Please note: Submissions received by email must contain full contact details.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Personal information is used for the administration of the submissions process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

Form 6 of Schedule 1, Resource Management Act 1991.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

NAME OF ORIGINAL SUBMITTER: refer attached **ORIGINAL SUBMITTER ID:** refer attached

ADDRESS OF ORIGINAL SUBMITTER: refer attached

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

PROVISION (e.g. Objective 4 or Rule 3.11.5.1): refer attached **SUBMISSION POINT ID** (e.g. PC1-1234 or V1PC1-1234) refer attached

Do you support or oppose the submission? Support Oppose

THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:
Tell us why you support or oppose this submission. These reasons will help us to understand your further submission

refer attached

I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED): *Give precise details*

refer attached

NOTES ON MAKING A FURTHER SUBMISSION

1. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on (i.e. received by) Waikato Regional Council.

2. Further submission content review

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

3. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available on Council's website. Under the RMA, any further submission supporting or opposing an original submission is required to be served on the original submitter after it is served on council therefore your contact details must be made available.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

Contact us for more information

Phone: 0800 800 401

Email: healthyivers@waikatoregion.govt.nz

This document presents a Further Submission by the South Waikato District Council that is in addition to the WARTA (Waikato Regional Territorial Authorities) joint Further Submission lodged to Regional Plan Change 1 - Healthy Rivers.

South Waikato District Council is a member of and signatory to the WARTA Group Further Submission.

It was agreed by the participating local authorities to the WARTA Group that where resource management issues were of greater local concern or posed unique challenges to their local community then Councils could also choose to lodge an additional Further Submission in relation to those matters.

South Waikato District Council has chosen to also lodge a Further Submission. This Further Submission re-emphasizes the main themes stated in the Council's original submission (ID 72892) and submission concerning Variation 1 by identifying and supporting/allowing as appropriate, a selected number of original submissions important to the South Waikato community, relating to the promoting of the following five principles.

The five strategic outcomes that the Council supports are:

1. Effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities, innovation and diversification, and can be supported by sustainable land management practices.
2. A sub catchment approach to managing the four contaminants.
3. A sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
4. Methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
5. An evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.

These strategic themes are presented against the context of a district described in Appendix 2: Our District – An Economic and Community Profile, to the Council Submission.

The specific submission points from a number of submitters have been supported in whole or in part because they promote some or all these of five strategic outcomes.

Raukawa Charitable Trust	Fonterra Co-operative Group Ltd
Oji Fibre Solutions (NZ) Limited	NZ Forest Owners Association Inc
Hancock Forest Management (NZ) Limited	Miraka Limited
Waikato Regional Council	Waikato and Waipa River Iwi
Ata Rangi 2015 Partnership	Fertiliser Association of New Zealand
Trinity Lands Ltd Andrew Archer and Ian Elliott	

Refer to the following tables to identify which points are requested to be allowed or allowed in part.

Mayor, Jenny Shattock

Chief Executive, Craig Hobbs




Waikato and Waipa River Iwi [Submitter ID 74035]

C/o Kahui Legal

Attn: Damien Stone

PO Box 1654

Wellington 6140

Table 1.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Objective 2	PC1-3245	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural wellbeing <u>and prosperity</u> ."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none">• methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 6	PC1-3315	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease</u>	Allow in part	South Waikato District Council supports effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes – in one or more of the four contaminants."</u></p>		
Policy 7	PC1-3320	<p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants.
Policy 10	PC1 – 3342	<p>AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u></p>	Allow in part	<p>South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.</p>

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>a. Continued operation of regionally significant infrastructure; and</p> <p>b. Continued operation of regionally significant industry."</p>		
Policy 11	PC1-3349	<p>AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided. Where it is not... for the purpose of ensuring net positive effects on the environment to lessen any <u>by offsetting</u> residual adverse effects of the discharge..."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.
Policy 12	PC1-3353	<p>AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen catchment loads <u>within a sub-catchment</u> and the impact of that contribution on the likely achievement of the...</p> <p>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Policy 13	PC1-3403	AMEND Policy 13 to read: "When determining the... a. A consent term exceeding 25 years, where The applicant demonstrates the approaches..."	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4	PC1 – 3519	ADD a NEW Method to read: "3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will: a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan. For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."	Allow in part	South Waikato District Council supports: methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4.3	PC1 – 3409	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation actions to reduce those risks in order</u> to bring about	Allow in part	South Waikato District Council supports: methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more a <u>standardised</u> monitoring programme and then <u>potentially</u> moving to <u>less frequent</u> monitoring based on risk assessment and the outcome of previous <u>monitoring results</u>. <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u></p>		
3.11.4.5	PC1 – 3418	<p>AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently</u>. Sub-catchment planning..."</p>	Allow in part	South Waikato District Council supports a sub catchment approach to managing the four contaminants.

Miraka Limited [Submitter ID 73492]

Grant Jackson

108 Tuwhāretoa Street

PO Box 740

Taupo 3352

Table 1

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
3.11 Waikato and Waipa River Catchments	PC1-8742	ADOPT Freshwater Management Units at the sub-catchment scale AND REPLACE the list of Freshwater Management Units on page 11 and in Map 3.11-1 with sub-catchment based Freshwater Management Units.	Allow	South Waikato District Council supports: <ul style="list-style-type: none">• A sub catchment approach to managing the four contaminants
Full achievement of the Vision and Strategy will be intergenerational	PC1-8759	CLARIFY flexibility for Māori land (refer submission point 8829 re Policy 16 for further discussion) AND AMEND the second-to-last sentence of paragraph 8 so it reads: "This second stage will focus on land suitability and how land use impacts on water quality..." AND AMEND the last sentence to read: "Methods in Chapter 3.11 include the research and information to be developed to support this <u>the determination of a discharge allocation framework.</u> "	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none">• effects based provisions that accommodates changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported my sustainable land use practices.
Objective 1	PC1-8767	AMEND Objective 1 such that sub-catchments are Freshwater Management Units.	Allow	South Waikato District Council supports: <ul style="list-style-type: none">• a sub catchment approach to managing the four contaminants
Objective 2	PC1-8906	RETAIN Objective 2	Allow	South Waikato District Council supports:

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		AND AMEND the last sentence of Reasons for Adopting Objective 2 to read as follows: "... and it is important to minimise social disruption <u>and economic hardship</u> during this transition."		<ul style="list-style-type: none"> methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Objective 3	PC1-8775	AMEND to clarify how measurement and monitoring will be undertaken (such as with respect to the 10 per cent of the required change by 2016) AND AMEND to ensure that sub-catchments are identified as Freshwater Management Units.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> a sub catchment approach to managing the four contaminants
Objective 5	PC1-8809	AMEND to clarify the minimisation of new impediments (refer submission point 8829 re Policy 16 for further discussion).	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> effects based provisions that accommodates changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported my sustainable land use practices.
Reasons for adopting Objective 2	PC1-8907	AMEND the last sentence of Reasons for Adopting Objective 2 to read as follows: "... and it is important to minimise social disruption <u>and economic hardship</u> during this transition."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Method 3.11.4.5	PC1-8855	RETAIN Method 3.11.4.5.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> a sub catchment approach to managing the four contaminants
3.11.6 List of Tables and Maps	PC1-8900	RETAIN Rule 3.11.5.2	Allow in part	South Waikato District Council supports:

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				<ul style="list-style-type: none">• a sub catchment approach to managing the four contaminants

FERTILISER ASSOCIATION OF NEW ZEALAND [Submitter ID 73305]

Address for service:

Greg Sneath

PO Box 11519

Manners Street

WELLINGTON 6142

Table 1.

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Objective 1: Long term restoration and protection	PC1 – 9699	AMEND Objective 1 to read: "Long term <u>maintenance</u> , restoration and/or protection of water quality <u>as relevant</u> for each sub-catchment and Fresh Water Management Unit. By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the <u>maintenance</u> , restoration and/or protection of the 80 year water quality attribute targets in Table 3.11-1."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Objective 2: Social, economic and cultural wellbeing maintained in the long term	PC1 – 9700	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the <u>maintenance</u> , restoration and/or, protection of water quality in the Waikato River catchment, <u>in a way and at a rate</u> which enables the people and communities to continue to provide for	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		their social, economic and cultural well-being."		for purpose to promote sustainable management of natural and physical resources
3.11.3: Policies	PC1 – 11176	<p>AND ADD a NEW Policy to read: "<u>Policy 13A: Non-point sources consent duration.</u></p> <p><u>When determining an appropriate duration for any consent granted consider the following matters:</u></p> <p><u>a. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 1 to 4 will be met; and</u></p> <p><u>b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and</u></p> <p><u>The need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</u></p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
Policy 1: Manage diffuse discharges	PC1 - 9707	<p>AMEND Policy 1 to read:</p> <p>"Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to water and where</p>	Allow in part	<p>South Waikato District Council supports a sub catchment approach to managing the four contaminants.</p>

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>the sub-catchment is over allocated require reductions in these losses, by:</u></p> <p>a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges <u>losses</u> do not <u>increase reduce water quality or compromise achievement of the water quality attribute targets in Table 3.11-1;</u> <u>and</u></p> <p>b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>losses where required so as not to compromise achievement of the water quality attribute targets in Table 3.11-1;</u> and</p> <p>c. progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes."</p>		
Policy 2: Tailored approach	PC1 – 9712	<p>AMEND Policy 2 to read: "Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> from farming activities on properties and enterprises <u>and where the sub-catchment is over-allocated require reductions in these losses</u> by:</p>	Allow in part	South Waikato District Council supports a sub catchment approach to managing the four contaminants.

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce <u>control</u> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u>, with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and</p> <p>...</p> <p>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> to be proportionate to the amount of current <u>diffuse</u> discharge <u>to water</u>, (those losing discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment <u>with reductions guided by mitigations set out in specified a Farm Environment Plan and through implementation of Good Management Practice</u>; and</p> <p>e. Requiring stock exclusion <u>from water bodies, as identified in the Schedules to this Plan</u>, to be completed within 3</p>		

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		years following the dates ..."		
3.11.4.12: Support research and dissemination of best practice guidelines	PC1 – 10615	AMEND Method 3.11.4.12 as follows: "Waikato Regional Council will: a. <u>Work with stakeholders</u> to develop and disseminate best <u>industry agreed good</u> management practice guidelines for reducing the diffuse discharges to water of nitrogen, phosphorus, sediment and microbial pathogens; and..."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.5.1: Permitted Activity – Small and Low Intensity farming activities	PC1 – 10618	AMEND Rule 3.11.5.1 to refer to a schedule which is introduced to PPC1 to provide contaminant loss levels which are considered acceptable to provide for permitted activities, and correlate the acceptable loss thresholds to the simple input parameters listed in rule 3.11.5.1 AND AMEND Rule 3.11.5.1 to ensure that for a property which is greater than 4.1 hectares, any input limit for a permitted activity should be directly correlated to the acceptable contaminant loss threshold it represents.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.5.2: Permitted Activity Rule -Other farming activities	PC1 - 10621	AMEND Rule 3.11.5.2(4) to read: "Where the property or enterprise is greater than 20 hectares: b. The diffuse discharge of nitrogen from the property or enterprise does not exceed <u>the greater of</u> either:	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>i. the Nitrogen Reference Point; or ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed <u>except where the activity is managed in accordance with industry agreed good management practices</u>; and d. No winter forage crops are grazed in situ <u>except where the activity is managed in accordance with industry agreed good management practices</u>; and..."</p>		<ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1 – 10632	AMEND Rule 3.11.5.7 to be a discretionary activity.	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Schedule C – Stock Exclusion	PC1 – 10649	AMEND Schedule C to read: "2. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within one <u>three</u> metres of the bed of	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>the water body (excluding constructed wetlands)."</p> <p>AND ADD a third Exclusion after (I) and (II) as follows: "<u>III. Areas with a slope exceeding 25 degrees and where stream fencing is impractical.</u>"</p>		

OJI FIBRE SOLUTIONS (NZ) LIMITED [Submitter ID 73725]

Address for Service:

C/- Gill Chappell

PO Box 87070

Meadowbank

AUCKLAND 1742

Table 1.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
General Co-management of Waikato & Waipa Rivers	PC1-8935	UNDERTAKE an evaluation of PPC1 so that it complies with Section 32 of the RMA AMEND so that diffuse discharge sources adopt Best Practicable Option through consents conditions or the plan as an interim approach. AMEND so that all diffuse sources are incentivise to identify and adopt best management practices consistent with the Objectives of improvement of water quality over time. AMEND to recognise that for diffuse sources low capital cost options can be implemented sooner than higher cost options. AND AMEND so that non-point sources discharges are managed using Best Practicable Option AMEND so that there is some flexibility for landowners to choose the approach or action to mitigate adverse effects of land use change. AND AMEND so that consent	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none">● a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.● methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.● supports an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>are required to change land use as a restricted discretionary activity land use change and will be granted for application where Best Practicable Option is applied AMEND so the OVERSEER Model is used to help farmers fine tune options to reduce leaching (not allocation). AND AMEND so that Certified Industry Schemes [Third party schemes] apply for a consent to operate as a consented industry scheme. IF allocation is considered appropriate, AMEND so that allocation is based on a consistent foundation such as LUC (Land Use Capability) where land is treated like for like</p>		
Full achievement of Vision and Strategy will be intergenerational	PC1 -6196	<p>AMEND the Full achievement of the Vision and Strategy section of PPC1 by altering any statements referring to Rule 3.11.5.7 so that this section is consistent with the submissions proposed modification of the land use change rule AMEND the explanation in the Full achievement of the Vision and Strategy section to give effect to the alternative approach proposed in the submission.</p>	Allow in part	<p>South Waikato District Council supports an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources</p>
Use Values – Commercial, municipal and industrial use	PC1 - 6316	<p>ADD the following statement to the left hand column of Use values - Commercial, municipal and industrial use to read: "These industries contribute to the economic, social and cultural well-being of</p>	Allow	<p>South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.</p>

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		people and communities and are the major component of wealth creation within the region. These industries and associated primary production also support other industries and communities within the rural and urban settings."		
3.11.2 Objectives	PC1 - 6364	AMEND the Objectives to reflect numerical levels and targets which give effect to the National Policy Statement for Freshwater Management 2014. AND AMEND Table 3.11-1 and the Objective of PPC1 to ensure consistency with the National Policy Statement for Freshwater Management 2014.	Allow	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Objective 2:	PC1 - 6366	DELETE Objective 2 and incorporate the concept of the three well-beings [social economic and cultural well-being] into Objective 1.	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> ● methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. ● an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources

<p>Policy 6: Restricting Land Use</p>	<p>PC1 - 6404</p>	<p>DELETE Policy 6.</p>	<p>Allow in part</p>	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> ● effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. ● methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. ● an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
<p>Policy 7: Preparing for allocation in the future</p>	<p>PC1 - 6423</p>	<p>AMEND Policy 7 by redrafting it as a Method, with amendments to clarify that future allocation will not be grandparented or based on existing use OR ADD a new policy/method drafted to adopt the alternative approach proposed in the submission [to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach] and to provide the basis for collection of information and further research.</p>	<p>Allow in part</p>	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> ● a sub catchment approach to managing the four contaminants. ● a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. <p>an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources</p>

Policy 9: Sub-catchment mitigation planning, co-ordination and funding	PC1 - 6425	AMEND Policy 9 by clarifying the basis and timeframes for implementing cost effective mitigation strategies.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 10: Provide for point source discharges of regional significance	PC1 – 6426	AMEND Policy 10 to read: "...When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and/ or microbial pathogens to water or onto or into land, provide for the: a. <u>Provide for the Continued</u> operation of regionally significant infrastructure; and b. <u>Provide for the Continued</u> operation or expansion of regionally significant industry" AND AMEND the Glossary of terms by defining regionally significant industry to clearly include the Kinleith Industrial Park, <i>Sample wording provided.</i>	Allow	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 11: Application of Best Practicable Option and mitigation or offset effects to point source discharges	PC1 – 6547	AMEND Policy 11 to make it clear that an offset is not additional to, but may form part of the Best Practicable Options. AND AMEND Policy 11 to make clear that the discharge/activity will not require a ten percent or any other standardised numeric reduction in discharges towards the long term water quality improvements as	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

		indicated by the short term water quality attribute targets in Table 3.11-1 as an obligation additional to the adoption of the Best Practicable Options.		
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1 – 6551	<u>DELETE Policy 12 OR AMEND Policy 12 to read: "...In assessing consent application for point source discharges take into account: Consider the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term targets in Objective 3 or the progression towards the 80 year targets in Objective 1, taking into account:</u> a. <u>The relative proportion of nitrogen, phosphorus, sediment or microbial pathogens that the particular point source discharge contributes to the catchment load; and</u> b. <u>Past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and for new point source discharges the application of the best practicable option; and</u>	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

		<p><u>c. The ability to stage future mitigation actions to allow investment costs to be spread over time or occur at point in time and meet the water quality targets specified above; and</u></p> <p><u>d. The diminishing return on investment in treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option.</u></p> <p><u>e. for new or expanded regionally significant industry, the social and economic benefits of the proposal including the extent to which a net increase in low discharging land uses create a net benefit to the environmental health of the river(s)."</u></p>		
Policy 13: Point source consent duration	PC1 – 6561	REMOVE Policy 13 (a).	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4 Implementation Methods	PC1 – 6563	AMEND 3.11.4 Implementation Methods to ensure that the provisions of PPC1 or alternatively, the alternative approach proposed in the submission, are capable of implementation. AND AMEND Policy 7	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

		<p>by redrafting it as a NEW Method, with amendments to clarify that future allocation will not be grandparented or based on existing use OR</p> <p>ADD a new policy/method drafted to adopt the alternative approach proposed in the submission and to provide the basis for collection of information and further research.</p>		
3.11.4.5: Sub-catchment scale planning	PC1 – 6929	<p>AMEND Method 3.11.4.5 to reflect the alternative approach proposed in the submission If the alternative approach is not accepted THEN AMEND Method 3.11.4.5 to require sub-catchment plans to be prepared in sufficient time to support the timeframes for the development of Farm Environment Plans. AND AMEND by clarifying the basis and timeframes for implementing cost effective mitigation strategies.</p> <p>AND AMEND to require identified strategies to clearly require implementation using Farm Environment Plans [In line with Policy].</p> <p>AND AMEND Clause f) to read: "...Coordinate funding of mitigation work by <u>those land uses with diffuse discharges</u> contributing to water quality degradation, in proportion to that contribution and <u>benefit</u>...."</p>	Allow in part	South Waikato District Council supports a sub catchment approach to managing the four contaminants.

3.11.4.6: Funding and implementation	PC1 - 6939	ADD a NEW clause to Method 3.11.4.6 that recognises the need to monitor permitted activities and have funding in place to ensure monitoring of permitted activities occurs.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4.7: Information needs	PC1 – 6941	AMEND Method 3.11.4.7 first sentence to read: "...Gather information and commission appropriate scientific research to inform <u>mitigation strategies to manage any future framework for the allocation</u> of diffuse discharges:..."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.5: Rules	PC1 - 7704	AMEND 3.11.5 Rules by changing the implementation dates so that they take effect within 6 months of the release decisions pursuant to Clause 10 of Schedule 1 or any other appeals. ADD a NEW restricted discretionary activity - approval of certified scheme [in the submission referred to as Rule 8] to be based on the following concepts: <i>a)-c) refers</i>	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
3.11.5.1: Permitted Activity Rule – Small and Low Intensity farming activities	PC1 – 8081	AMEND Rule 3.11.5.1 so that Certified Industry Schemes must obtain resource consent. AND AMEND Rule 3.11.5.1 [alternative approach - Rule 1 permitted activity small and low intensity farming] to read: "...The use of land for farming	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the

		activities <u>less than 20 ha</u> and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a permitted activity subject to the following conditions:..... <i>Refer full summary.</i>		impacts on the social, economic and cultural well-being of communities.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1 - 8083	DELETE Rule 3.11.5.2 [Rule 2 in the alternative approach in the submission] and combine with Rule 3.11.5.1 [Rule 1 in the alternative approach in the submission].	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
3.11.5.3 Permitted Activity Rule – FEP under Certified Industry Scheme	PC1 - 8084	AMEND Rule 3.11.5.3 to read: " ...Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding or commercial vegetable production) where the land use is registered to a Certified Industry Scheme, and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a permitted activity provided that..... <i>Refer full summary</i>		
3.11.5.6: Restricted Discretionary Activity Rule – Use of land for farming activities	PC1 - 13076	ADD to Rule 3.11.5.6 a new Matter of Control that reads: " <u>...Mitigation actions that maintain or reduce the diffuse discharge of nitrogen, phosphorus or sediment to water or</u>	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

		to land where those contaminants may enter water including Best Management Practices to achieve Objective 3.....		
3.11.5.7: Non-Complying Activity Rule – Land Use Change	PC1 – 8716	<p>DELETE Rule 3.11.5.7 OR AMEND to make changes as appropriate to reflect the reasons for the submission including:</p> <p>AND OR the alternative approach proposed in the submission [overview in Table 2 of the submission - Rule 7].</p> <p>IF the rule is retained then AMEND the notification provision to read:</p> <p>"Consent applications will be considered without notification, and without the need to obtain written approval of affected persons subject to the Council being satisfied that the loss of contaminants from the proposed land use will be lower than that from the existing land use." AND AMEND so that land use change is a restricted discretionary activity, discretion is restricted to the implementation of Best Practicable Option and applicable to other farming activities</p> <p>OR AMEND Rules to incorporate Best Practicable Option for new farming activities into the permitted activity rules.</p>	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

Schedule B: Nitrogen Reference Point	PC1 – 8743	AMEND PPC1/Schedule B to ensure that the Nitrogen Reference Point is used as a benchmark and is not used as the basis for grandparenting.	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Schedule C – Stock exclusion	PC1 – 8803	AMEND Schedule C to refer to livestock (not including sheep) AMEND the provisions to ensure that stock exclusion represents the Best Practicable Options for specific land uses and associated activitiesOR apply a stock exclusion buffer the is appropriate to the size and location of the water body eg 10m for rivers, lakes and wetlands and 20m for regionally significant water bodies plus 0.62 times the LUC average.	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Schedule 1 – Requirements for Farm Environment Plans	PC1 – 8806	AMEND so that Schedule 1 is only for the purpose of providing information to support applications under Rule 3.11.5.6 AND AMEND to clarify the practical application of the Farm Environment Plan including what actions are mandatory, how sub-catchment targets in Table 3-11.1 will be translated into Farm Environment Plan, how and who Farm Environment Plan will apply	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
3.11.6: List of Tables	PC1 – 8828	AMEND Table 3.11-1 and the Objective of PPC1 to ensure consistency with the National Policy Statement for Freshwater Management 2014.	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance

		AMEND to clarify that the targets are aspirational goals. AND if the targets in Table 3.11-1 are retained then AMEND by clarifying how targets will be applied to the implementation of PPC1.		
Additions to Glossary of Terms	PC1 - 12311	AMEND PPC1 by providing a definition of regionally significant industry that includes that Kinleith Industrial Park, for example, as follows: "Regionally significant industry- means industry based on the region's use of natural and physical resources which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes: a) Wood processing plants; b) Dairy manufacturing sites; c) Meat processing plants; d) Mineral extraction activities; and e) Renewable energy generation."	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Definition - Offset	PC1 - 8946	AMEND in Glossary of terms the definition of Offset to read: "For the purposes of Chapter 3.11 means for specific contaminants <u>an alternative actions to achieve a prescribed obligation</u> that reduces residual adverse effects of that contaminant on water quality." AMEND PPC1 so that Offsets are available to all resource users.	Allow in part	South Waikato District Council supports effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

Definition – Stock Unit	PC1 - 8948	DELETE from the Glossary of terms the definition of Stock Unit OR AMEND so that the units and weights are appropriate for PPC1 and are consistent between drystock and dairy operations [submission refers to the proposed alternative approach].	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
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WAIKATO REGIONAL COUNCIL [Submitter 72890]

C/- Andrew Tester

Private Bag 3038

Waikato Mail Centre

HAMILTON 3240

Table 1.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1 – 2989	Retain objective 2	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1 – 3060	Retain policy 9	Allow in part	South Waikato District Council supports a sub catchment approach to managing the four contaminants.
Policy 10: Provide for point source discharges of regional significance	PC1-3061	AMEND Policy 10 to read: “a. Continued operation of regionally significant infrastructure , <u>including the need for flood and drainage infrastructure to convey water during flood events;</u> and”	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 11: Application of Best Practicable	PC1-3062	AMEND Policy 11 so that flood management and drainage infrastructure	Allow in part	South Waikato District Council supports:

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Option and mitigation or offset of effects to point source discharges		are not required to mitigate contaminants that are sourced from land use activities within catchment.		<ul style="list-style-type: none"> a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. <p>a sub catchment approach to managing the four contaminants.</p>
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3066	<p>AMEND Policy 12 to read: "<u>e. That flood and drainage infrastructure is not contributing to catchment loads but conveying water for flood management purposes.</u>"</p> <p>AND AMEND Policy 12 to read: "Consider the contribution... on the likely achievement of the short term targets^ in Objective 3 and the short term targets^ in Table 3.11-1, or the progression towards the 80 year targets^ in Table 3.11-1 and Objective 1 taking into account:..."</p> <p>AND AMEND Policy 8(a) to read: "Sub-catchments where there is a greater gap between the water quality targets^ in Objective 1 (Table 3.11-1) and current water quality; ..."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 13: Point sources consent duration	PC1 – 3095	AMEND Policy 13(a) to read: "A consent term exceeding 25 years, where the applicant demonstrates the approaches	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		set out in Policies Policy 11 and 12 will be met; and...”		and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4: Implementation methods	PC1 - 3101	AMEND 3.11.4 the provisions related to nitrogen management so that the methods can be implemented. AND AMEND the provisions related to commercial vegetable production so that the methods can be implemented.	Allow	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4.3 Farm Environment Plans	PC1 – 3102	AMEND Method 3.11.4.3 to read: “Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for professionals <u>Farm Environment Planners</u> to develop, certify and monitor Farm Environment Plans in a consistent approach across the region. A <u>The Farm Environment Plan</u> will be prepared by a certified person as per the requirements outlined in Schedule 1, and will assess the risk of diffuse discharges of... Waikato Regional Council will take a risk based approach to monitoring Farm Environment Plans, starting with more frequent monitoring and then moving to monitoring based on risk assessment. Robust third party audit (independent of the farmer <u>landowner</u> and Certified Farm Environment Planner) and monitoring will be required.”	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
3.11.4.5: Sub-catchment scale planning	PC1 – 3106	<p>AMEND Method 3.11.4.5 to read: “Waikato Regional Council will work with others to develop ...where it has been shown to be required. Sub-catchment scale planning will <u>may</u>:...” AND AMEND Method 3.11.4.5 (e) to read: “Integrate the regulatory requirements to fence waterways water bodies with the requirements for effective drainage scheme management.” AND DELETE Method 3.11.4.5 (f) in its entirety. AND REPLACE Method 3.11.4.5 (f) with: “<u>Develop funding models for sub-catchment planning processes and mitigation actions where an individual’s contribution to funding is proportional to their contribution to sub-catchment contaminant discharges.</u>”</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • a sub catchment approach to managing the four contaminants.
3.11.5.1: Permitted Activity Rule -Small and Low Intensity farming activities	PC1 - 3115	<p>AMEND Rule 3.11.5.1 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND 3.11.5.1 (4) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property (unless the enterprise has a total area of less than or equal to 4.1 hectares); or"</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>AND AMEND 3.11.5.1 (7) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property (unless the enterprise has a total area of less than or equal to 20 hectares)"</p> <p>AND AMEND 3.11.5.1(2) to read: "The use of land for farming activities cattle, horses, deer and pigs are excluded from water bodies in conformance with complies with Schedule C; and"</p> <p>AND AMEND 3.11.5.1(1) to read: "The property (if greater than 2 hectares) is registered with the Waikato Regional Council in conformance shall comply with Schedule A; and"</p>		
<p>3.11.5.3: Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>PC1 – 3417</p>	<p>AMEND Rule 3.11.5.3 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1.</p> <p>AND AMEND Rule 3.11.5.3(3) to read: "<u>The use of land for farming activities</u>cattle, horses, deer and pigs are excluded from water bodies in conformance withshall comply with Schedule C;"</p> <p>AND AMEND Rule 3.11.5.3 to include a specific requirement that land users must farm such that</p>	<p>Allow in part</p>	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

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		when their farming activities are modelled in OVERSEER®, the OVERSEER® nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property.		
3.11.5.4: Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1 – 3420	<p>AMEND Rule 3.11.5.4 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1</p> <p>AND AMEND Rule 3.11.5.4 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the Overseer nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property</p> <p>AND AMEND to introduce provisions throughout PPC1 to enable the reassignment of Nitrogen Reference Point entitlements between properties when new land is incorporated into a property</p> <p>AND DELETE all references in PPC1 to the '5 year rolling average' (Rule 3.11.5.4 and Schedule 1)</p> <p>AND MAKE any consequential amendments to delete the definition in the Glossary in Part C</p> <p>AND AMEND to use the Nitrogen Reference Point as a yardstick to indicate the relative amount of</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>nitrogen being lost from a property AND AMEND Rule 3.11.5.4(iii) to read: "The actions, timeframes and other...the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified." OR alternatively AMEND Rule 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised AND AMEND Rule 3.11.5.4(5) to require compliance with the Nitrogen Reference Point in the period during which the property owner is permitted under this rule AND AMEND to require compliance with Schedule B AND AMEND Rule 3.11.5.4 and Schedule B to delete the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property AND AMEND Rule 3.11.5.4 to provide for a more refined staging of resource consent applications</p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>over each of the three year period in each priority order but remain with the priority order in Table</p> <p>3.11-2</p> <p>AND AMEND Rule 3.11.5.4(5)(c) to read: "A Nitrogen Reference Point has been produced for the property or enterprise in conformance to comply with Schedule B and is <u>has been</u> provided to the Waikato Regional Council at the time the resource consent application is lodged.."</p> <p>AND AMEND Rule 3.11.5.4(4) to add a new item to read: "<u>The use of land for farming activities</u> complies with Schedule C."</p> <p>AND AMEND Rule 3.11.5.4(5)(d) to read: "<u>The use of land for farming activities</u> cattle, horses, deer and pigs are excluded from water bodies in conformance with <u>complies</u> with Schedule C."</p> <p>AND AMEND Rule 3.11.5.4 to re-number 4 and 5 to become a. and b. and remove the indent on the paragraph starting with 'after the dates...'</p>		
3.11.5.7: Non-Complying Activity Rule – Land Use Change	PC1 – 3480	<p>AMEND Rule 3.11.5.7 to read: "Notwithstanding any other rule in the Plan <u>Except as authorised under rules 3.11.5.1, 3.11.5.2, 3.11.5.3 and 3.11.5.4</u> any of the following changes..."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>OR alternatively AMEND Rule 3.11.5.7 to exclude from its scope, changes of land use that occur within properties or enterprises as existing at the date of notification of the Plan AND AMEND Rule 3.11.5.7 (4) to read: "Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5 <u>or a consent granted under Rule 3.11.5.6.</u>" AND AMEND Rule 3.11.5.7: Notification to read: "Consent applications will be considered without notification,... will be lower than that from the existing land use <u>land use as at 22 October 2016.</u>" AND AMEND Rule 3.11.5.7 to read: "Notwithstanding any other rule in this plan, any of the following changes in the <u>ongoing use... property or enterprise and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens on or into land in circumstances which may result in those contaminants entering water</u> located in the Waikato and Waipā River catchments..." AND AMEND Rule 3.11.5.7(2) to read: "Any livestock grazing other than</p>		<p>can be supported by sustainable land management practices.</p> <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		dairy farming land use, except for commercial vegetable production to dairy farming:" AND DELETE Rule 3.11.5.7(3) in its entirety.		
Schedule A – Registration with WRC	PC1 – 3536	AMEND Schedule A to read: “Properties with an area greater than 2 hectares <u>4.1 hectares</u> (excluding urban properties) must...” AND AMEND Schedule A clause 3 to read: “ <u>Within 7 working days of a request from the Waikato Regional Council</u> , proof of registration must be provided to the Waikato Regional Council...” AND AMEND Schedule A clause 5 to read: “All property land owners must provide...”	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Schedule B – Nitrogen Reference Point	PC1 – 3553	AMEND Schedule B to remove the ability for an enterprise to hold a Nitrogen Reference Point, and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property. AND AMEND to clarify whether it is the current, intended, or previous land use that determines the appropriate nitrogen reference period to use. AND AMEND clause a. to read: "The Nitrogen Reference Point must be calculated approved by a Certified Farm Nutrient Advisor..."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>AND AMEND clause b. to read: "The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single <u>financial year (being 12 consecutive months)</u> within the reference...'</p> <p>AND AMEND clause d. to read: "...and where the OVERSEER® Model is used, it must be calculated using the Overseer® Best Practice Data input standards <u>2016 that relate to the version of the Overseer® model being used</u>, with the exceptions and inclusions set out in schedule B table 1."</p> <p>AND AMEND clause f. to read: "The <u>Nitrogen Reference Period</u> is the two... except <u>where the primary land use is for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 or such lesser, relevant period if the land was used for commercial vegetable production during only part of that period.</u>"</p> <p>AND AMEND Schedule B clause g. to read: "...</p> <p>i. <u>Stock numbers as recorded in annual accounts together with stock sale and purchase</u></p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>invoice <u>Records of stock numbers and stock classes, births and deaths, stock movement on and off the property, grazing records and transport records;</u></p> <p>ii. Dairy production data;</p> <p>iii. Invoices for fertiliser applied to the land <u>Records of fertiliser type and amount, application rates and fertiliser placement records;</u></p> <p>iv. Invoices for <u>Records of feed supplements and amount sold or purchased, and records of supplements grown and fed on farm;</u></p> <p>v. Water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates <u>mm/ha/month per irrigated block, and proof of areas irrigated (for Overseer® block setup);</u></p> <p>vi. Records of crops grown on the land and grazed <u>including area and yield, and including cultivation and sowing records where available; and</u></p> <p>vii. <u>A map detailing the location and area of land used for effluent irrigation;</u></p> <p>viii. vii. Horticulture crop diaries and NZGAP records.</p> <p>ix. <u>Soil test data – including anion storage capacity</u></p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>x. <u>A map detailing the property boundaries, areas including block (management) areas and retired areas, and the total area of non-productive areas; and</u></p> <p>xi. <u>Certificate of title and legal description.</u>"</p> <p>AND ADD an advice note to read: "<u>Advice note: For the avoidance of doubt, financial information contained within the above records may be redacted (blacked out) prior to it being provided to Waikato Regional Council.</u>"</p> <p>AND AMEND Schedule B Table 1 by deleting the existing Table 1 and replace with the new Table 1 in Appendix A to the submission.</p> <p>AND AMEND Schedule B clause d to read: "...with the <u>settings that must be used complying with exceptions and inclusions set out in Schedule B Table 1. Where another approved model is used, it will conform to the data input standards as approved by the Chief Executive of the Waikato Regional Council.</u>"</p>		
Schedule C – Stock exclusion	PC1 - 3571	AMEND Schedule C to ensure that it is not inconsistent with the national regulations and to ensure that together they provide	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>for the most efficient and effective approach to stock exclusion.</p> <p>AND ADD at the end of Schedule C an advisory note to read: "<u>A reference to a river includes a reference to a stream.</u>"</p> <p>AND AMEND Schedule C to ensure consistency with Schedule 1 stock exclusion requirements.</p> <p>AND AMEND Schedule C: Exclusions to read: "The following situations are excluded from clauses 1 and 2 <u>clause 3.</u>"</p> <p>AND AMEND Schedule C clause 5 to read: "For land use authorised... Farm Environment Plan, <u>prepared in accordance with Schedule 1,</u> which shall be within 3 years..."</p>		<p>opportunities and diversification, and can be supported by sustainable land management practices.</p> <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Schedule 1: Requirements of Farm Environment Plans	PC1 – 3575	<p>DELETE Schedule 1 references to the 5 year rolling average and instead measure compliance based on whether the proposed mitigation actions listed in a Farm Environment Plans are completed.</p> <p>AND AMEND Schedule 1 clause 2 (e) to read: "A description of nutrient management practices including... using the model OVERSEER® in accordance with the OVERSEER® <u>data input standards and Table 1: Schedule</u></p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>By use protocols , or using any other model or method approved"</p> <p>AND AMEND Schedule 1: Vegetable growing minimum standards Row 5 of the table</p> <p>Soil/Phosphorus to read: "As a minimum by block: an approved erosion and sediment control plan constructed <u>compiled by the Certified Farm Environment Planner</u> in accordance with the Erosion and Sediment Control Guidelines for Vegetable Production June 2014"</p> <p>AND AMEND Schedule 1 clause 5(a) to read: "Actions, timeframes and other measures.... or enterprise's Nitrogen Reference Point unless other suitable mitigations are specified."</p> <p>OR AMEND 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised.</p>		
Schedule 1: Requirements of Farm Environment Plans	PC1 – 12544	<p>AMEND Schedule 1 to simplify the numbering</p> <p>AND AMEND to reflect the standards/terms/conditions in the rules</p> <p>OR DELETE the references to some of the minimum standards in Schedule 1</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>OR AMEND to reflect the standards as 'best management practice' recommendations rather than firm requirements</p> <p>AND AMEND to renumber Schedule 1 clause "2(f)(ii)(e)" to clause "<u>2(g)</u>"</p> <p>AND AMEND to renumber clause "2(f)(ii)(f)" to clause "<u>2(h)</u>"</p> <p>AND AMEND Schedule 1 clause 4 to read: "A description of the actions... (having regard to their relative priority <u>and to the need for proportionality as specified in Policy 2(d) and 3(g)</u>) as well as where the mandatory..."</p> <p>AND AMEND Schedule 1 clause 2(b)(ii) to read: "Where practicable the provision... for land with a slope of less less than 15°..."</p>		<ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Schedule 1: Requirements of Farm Environment Plans	PC1 – 12545	<p>AMEND Schedule 1 clause 2(f)(i) to read: "The identification of slopes over... from that cultivation can be avoided <u>minimised</u>; and"</p> <p>AND AMEND Schedule 1 Clause 2(f)(ii)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback <u>or a lesser distance greater than 1m with appropriate mitigation measures specified in the Farm Environment Plan</u>)."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		AND AMEND Schedule 1 clause 2(f)(ii)(f) to read: "A description of freshwater... to groundwater or surface water will be minimised. <u>This description shall, unless otherwise authorised by a resource consent, include information that demonstrates compliance with conditions (a) to (f) of rule 3.4.5.6 of the Waikato Regional Plan.</u> "		
WRC VARIATION 1 SUBMISSION				
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1 – 199 V1PC1 - 207	AMEND Policy 2 to provide further guidance for timeframes associated with identified mitigation actions. AMEND Policy 2(d) to refer to "water quality improvement required in the sub-catchment, Freshwater Management Unit (FMU) or catchment as appropriate".	Allow	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	V1PC1 - 208	AMEND Policy 3(g) to refer to "water quality improvement required in the sub-catchment, Freshwater Management Unit (FMU) or catchment as appropriate".	Allow	South Waikato District Council supports a sub catchment approach to managing the four contaminants.
Policy 9: Sub-catchment (including edge of field) mitigation planning, coordination and funding	V1PC1 – 1489	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3060: [RETAIN Policy 9.]	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				<p>can be supported by sustainable land management practices.</p> <ul style="list-style-type: none"> a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	V1PC1 - 214	AMEND Rule 3.11.5.1 to specifically provide for the cutting and removing of grass for hay, silage or disposal.	Allow	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Schedule A – Registration with WRC	V1PC1 - 216	AMEND Schedule A(f) to read: "Where the land is used for grazing and no NRP is required under this Plan, the stocking rate of the animals grazed on the land".	Allow	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Definition – Enterprise	V1PC1 – 230	AMEND the last sentence of the definition of "Enterprise" to read: "An enterprise is considered to be within a subcatchment if	Allow	<p>South Waikato District Council supports:</p>

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		the greatest proportion of that enterprise is within the sub-catchment".		<ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

HANCOCK FOREST MANAGEMENT (NZ) LIMITED [Submitter ID 73724]

Address for Service:

Sally Strang
PO Box 648
Tokoroa3420

Table 1.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
General	PC1 – 8933	<p>AMEND PPC1 by adopting a best practicable option approach through consent conditions OR plan rules, as an interim approach</p> <p>AMEND to recognise that low capital cost options can be implemented sooner than high capital cost items</p> <p>AMEND so that land use is not 'frozen'. Allow flexibility so that there can be a choice in terms of approach and mitigations</p> <p>AMEND to allow land use change as a restricted discretionary activity where the best practicable option is applied from the outset of the land use change</p> <p>AMEND so that the OVERSEER Model is part of a matrix approach</p> <p>AMEND, so that if an allocation regime is adopted, it is based on consistent foundation (such as LUC) treating like land alike.</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources
3.11.2: Objectives	PC1-5368	<p>ADD a NEW Objective to read: <u>"The management of discharges onto or into land or directly into water and land</u></p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based rules that accommodate changes in land use activity, provide for multiple land use

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>use activities affecting groundwater and surface water quality in a manner that: a) Safeguards the life supporting capacity of water and recognises and provides for the restoration and protection of the 80 year water quality attribute goals in Table 3.11-1, through the adoption of the best practicable option; b) Where a discharge is onto or into land, avoids, remedies or mitigates adverse effects on surface water or groundwater. c) Recognises that discharges contribute to social and economic well-being and in some cases significant investment relies those discharges, including rural based activities such as agriculture, perishable food processing and industry; d) Recognises that new regionally significant industrial discharges contribute to social and economic well-being and may be appropriate where such activities increase the net efficiency of resource use or where changes to land use."</u></p>		<p>opportunities and diversification, and can be supported by sustainable land management practices.</p> <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1 - 5372	DELETE Objective 2 and incorporate the concept of the three well-beings into Objective 1.	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				promote sustainable management of natural and physical resources.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1 - 12782	AMEND Policy 2 (e) as required to reflect realistic time frames for extensive drystock farms.	Allow	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Policy 4: Enabling activities with lower discharges to continue	PC1 - 5608	AMEND Policy 4 to enable low discharge land uses such as forestry. AMEND to ensure that mitigation actions are applied to all farming activities taking into account relative contributions and risk	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Policy 6: Restricting land use change	PC1 – 5633	DELETE Policy 6.	Allow	South Waikato District Council supports effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.
Policy 7: Preparing for allocation in the future	PC1 – 5662	AMEND Policy 7 to provide a clearer transition toward a non-grandparenting approach to allocation within the life of PPC1 to create certainty for land users.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				<ul style="list-style-type: none"> a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Policy 9: Sub-catchment mitigation planning	PC1 - 5684	AMEND Policy 9 by specifying the timeframes for implementation of the cost-effective mitigations	Allow	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi	PC1 – 5707	AMEND Policy 16 by enabling flexibility of land use for all landowners within reasonable constraints. In conjunction with other amendments this policy may be unnecessary	Allow in part	South Waikato District Council supports effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.
3.11.4.5: Sub-catchment planning	PC1 – 5759	AMEND Method 3.11.4.5 to ensure that mitigation work is funded by land uses with diffuse discharges in proportion to contribution and benefit.	Allow	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> a sub catchment approach to managing the four contaminants. a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
3.11.4.7: Information needs to support any future allocation	PC1 – 5762	AMEND Method 3.11.4.7 to read: "Gather information and commission appropriate research to inform <u>mitigation strategies to manage any future framework for the allocation</u> of diffuse discharges including..."	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4.12: Support research and dissemination of best practice guidelines	PC1 – 5768	AMEND Method 3.11.4.12 to include the requirement to implement Best Practicable Options (over an appropriate timeframe) where they are already know to be practical and effective.	Allow	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4.5.4: Controlled Activities Rule -Farming activities with a Farm Environment Plan not under a Certified Scheme	PC1 – 5774	AMEND Rule 3.11.5.4 so that farming activities are permitted subject to application of the Best Practicable Option. AMEND by incorporating the minimum standards in the Farm Environment Plan into the rules, including the information requirements contained in the Farm Environment Plan. AMEND by removing the reliance on the Nitrogen Reference Points and OVERSEER as a method for assessing compliance.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.5.7: Non-Complying Activity Rule – Land Use Change	PC1 – 5782	DELETE Rule 3.11.5.7 AND REPLACE it with Best Practicable Option based rules that require those causing the adverse effects associated with their activities to avoid, remedy or mitigate those activities.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				<ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
Schedule A – Registration with Waikato Regional Council	PC1 – 5785	AMEND Schedule A to apply to farming activities only OR AMEND, if the intent is to require registration of forestry blocks, Schedule A taking into account suggestions to streamline the process....	Allow	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based rules that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Schedule B – Nitrogen Reference Point	PC1 – 5786	AMEND the approach such that Nitrogen Reference Points are used as an information gathering tool only.	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

Ata Rangi 2015 Partnership [Submitter ID 74073]

C/o Tompkins Wake

Attn: Marianne Mackintosh

Westpac House

PO Box 258

Hamilton 3240

Table 1.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
General	PC1-11373	REVIEW and AMEND the Section 32 evaluation of the scenarios considered for PPC1, including an evaluation of Scenario 2 AND AMEND PPC1 to clarify the type of resource consent which must be applied for in respect of its proposed new rules.	Allow in Part	South Waikato District Council supports: <ul style="list-style-type: none">• a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.• methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.• an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources
Objective 1	PC1 – 6094	Objective 1: CONSIDER reviewing and making amendments to the Section 32 evaluation of the scenarios considered for PPC1	Allow	South Waikato District Council supports: <ul style="list-style-type: none">• effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>AND AMEND PPC1 as a consequence of the review</p> <p>AND MAKE any consequential amendments to Table 3.11-1</p> <p>AND CONSIDER granting relief sought regarding land use flexibility, including land use change and offset mitigation opportunities.</p>		<ul style="list-style-type: none"> an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources
Objective 2	PC1-6094	<p><u>"Waikato and Waipā communities are able to provide for their social, economic and cultural well-being in the short term (10 years) and long term (80 years), recognising that the Waikato and Waipā communities and their economy may ultimately benefit from the restoration and protection of water quality in the Waikato River catchment. This is turn will which enables the people and communities to continue to provide for their social, economic and cultural wellbeing."</u></p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Objective 3	PC1-6100	<p>AMEND Objective 3 as set out below, or such alternative wording in order to address the reasons for submission: "Actions put in place and <u>Changes to land use and water management are implemented by 2026 which reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, and are sufficient to eventually achieve ten percent of the required change between</u></p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1."		
Objective 4	PC1-6113	<p>AMEND Objective 4 as follows:</p> <p>"A staged approach to changing e enables people and communities to provide for their the management of land use <u>and related diffuse discharges</u> undertake adaptive enables people and communities to <u>continue to provide for their</u> social, economic and cultural well-being in the short term (the period to 2026) <u>and to continue to realise the values and uses while:</u></p> <p>a. <u>considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1; and</u></p> <p>b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed in order to meet Objective 1."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Policy 1	PC1-6133	AMEND PPC1 to define or explain what is meant by 'low level of contaminant discharge' and 'high levels of contaminant discharge'.	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Policy 2	PC1-6122	<p>"d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchments <u>which is capable of being achieved in the short-term taking into account the particular characteristics of each sub-catchment;...</u>"</p> <p>AND ADD a NEW clause da. as follows: <u>"da. Providing for and allowing opportunity for offset mitigation between properties or enterprises which will achieve the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens proportionate to the amount of current discharge and proportionate to the scale of water quality improvement required in the subcatchments</u></p>	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>capable of being achieved in the period to 2026, taking into account the particular characteristics of each sub-catchment."</u></p>		
Policy 6	PC1-6133	<p>AMEND Policy 6 as follows: Except as provided for in Policy 16, <u>Policy [X1]</u>, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted.</p> <p>AND ADD new policies as follows: <u>"Policy [X1] - Flexibility for land use change which commenced prior to 1 June 2015</u> <u>Land use change consent applications for properties or enterprises that commenced land use change activities prior to 1</u> <u>June 2015 and that will not result in an increased diffuse discharge of nitrogen, phosphorus, sediment and microbial</u></p>	Allow, in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <p><u>i. Implementation of best management practice actions for nitrogen, phosphorus, sediment and microbial pathogens for the proposed land use, including through the use of Farm Environment Plans for each property or enterprise; and</u></p> <p><u>ii. The creations of positive economic, social and cultural benefits for the Waikato Region.</u></p> <p><u>Policy [X2] - Flexibility for land use change</u></p> <p><u>Land use change consent applications for activities that will not result in an increased diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <p><u>i. Implementation of best management practice actions for nitrogen, phosphorus, sediment and microbial pathogen for the proposed land use through the use of Farm Environment Plans for each property or enterprise; and</u></p> <p><u>ii. The creation of positive economic, social and cultural benefits for the Waikato Region."</u></p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Method 3.11.4.6	PC1-6162	AMEND Method 3.11.4.6 to include reference to Waikato Regional Council providing a fund to assist land owners, including financial incentives to re-purpose or retire land.	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Rule 3.11.5.2	PC1-6192	AMEND Rule 3.11.5.2(4) as follows: "c. No part of the property or enterprise over 15 23 degrees slope is cultivated or grazed; and d. No winter forage crops are grazed in situ, <u>within 10 metres of any waterway;</u> and..."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Rule 3.11.5.7	PC1-6201	ADD a NEW restricted discretionary activity Rule 3.11.5.7A as follows: <u>"Rule 3.11.5.7A Restricted Discretionary activity rule - Land Use Change Notwithstanding any other rule in this Plan, in order to achieve a staged approach to change, any of the following</u>	Allow, in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, including in circumstances where the use of land included the ongoing conversion of land from production forestry to farming activity (including arable cropping), AND where the ongoing conversion of land from production forestry to farming activity was commenced prior to 1 June 2015 are restricted discretionary activities (requiring resource consent):</u></p> <p><u>1. Woody vegetation to farming activities; or</u></p> <p><u>2. Any livestock grazing other than dairy farming to dairy farming; or</u></p> <p><u>3. Arable cropping to dairy farming.</u></p> <p><u>Subject to the following standards and terms:</u></p> <p><u>a) The 5-year rolling average does not exceed the Nitrogen Reference Point, or where Nitrogen Reference Point has not been calculated, the average nitrogen loss for the property or enterprise over the 5 year period ending 30 June of the preceding financial year that the application is made.</u></p>		<ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C.</u> <u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <ul style="list-style-type: none"> <u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u> <u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u> <u>iii. The need for and the content of a Farm Environment Plan.</u> <u>iv. The term of the resource consent.</u> <u>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u> <u>vi. The time frame and circumstances under which the consent conditions may be reviewed."</u> <p>AND ADD a NEW restricted discretionary activity Rule 3.11.5.7B: <u>"Rule 3.11.5.7B Restricted Discretionary activity rule - Land Use Change</u> <u>Notwithstanding any other rule in this Plan, in order to achieve a staged approach to change, any of the following</u></p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares are restricted discretionary activities (requiring resource consent):</u></p> <p><u>1. Woody vegetation to farming activities;</u> <u>or</u> <u>2. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>3. Arable cropping to dairy farming;</u> <u>4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <u>Subject to the following standards and terms:</u></p> <p><u>a) The 5-year rolling average does not exceed the Nitrogen Reference Point, or where Nitrogen Reference Point has not been calculated, the average nitrogen loss for the property or enterprise over the 5 year period ending 30 June of the preceding financial year that the application is made.</u></p> <p><u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C.</u></p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <ul style="list-style-type: none"> <u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u> <u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u> <u>iii. The need for and the content of a Farm Environment Plan, including the use of offset mitigation measures.</u> <u>iv. The term of the resource consent.</u> <u>v. The monitoring, record keeping, reporting, and information provision requirements for the holder of the resource consent.</u> <u>vi. The time frame and circumstances under which the consent conditions may be reviewed."</u> <p>AND AMEND Rule 3.11.5.7 as follows: Rule 3.11.5.7 - Non-complying activity rule - Land Use Change <u>"The following activities which do not comply with the standards and terms of rule(s) 3.11.5.7A [or 3.11.5.7B] are noncomplying activities:</u> <u>Changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in</u></p>		

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares..."</p> <p>AND AMEND to include any appropriate or consequential amendments to the rules set out above, or any other rule in PPC1 in order to address the reasons for submission and/or ensure drafting consistency.</p>		

Raukawa Charitable Trust [Submitter ID 74073]

C/o Kahui Legal

Attn: Damien Stone

PO Box 1654

Wellington 6140

Table 1.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Objective 2	PC1-10600	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural wellbeing <u>and prosperity</u> ."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 6	PC1-10553	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.	Support in part	South Waikato District Council supports effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes – in one or more of the four contaminants."</u></p>		
Policy 7	PC1-10579	<p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants.
Policy 10	PC1 – 10581	<p>AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land,</p>	Allow in part	<p>South Waikato District Council supports methods of implementation that are affordable to land owners and communities and</p>

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>provide have regard to the continued operation of: a. Continued operation of regionally significant infrastructure'; and b. Continued operation of regionally significant industry'."</p>		<p>minimises the impacts on the social, economic and cultural well-being of communities.</p>
Policy 11	PC1-10555	<p>AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided. Where it is not... for the purpose of ensuring net positive effects on the environment to lessen any <u>by offsetting</u> residual adverse effects of the discharge..."</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.
Policy 12	PC1-10556	<p>AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen catchment loads <u>within a sub-catchment</u> and the impact of that contribution on the likely achievement of the... d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction</p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • a sub catchment approach to managing the four contaminants.

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		through the application of the Best Practicable Option*."		
Policy 13	PC1-10558	AMEND Policy 13 to read: "When determining the... a. A consent term exceeding 25 years, where the applicant demonstrates the approaches..."	Allow in part	South Waikato District Council supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4	PC1 – 10582	ADD a NEW Method to read: "3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will: a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan. For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."	Allow in part	South Waikato District Council supports: methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
3.11.4.3	PC1 – 10562	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare..."	Allow in part	South Waikato District Council supports:

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>and microbial pathogens and specify <u>the range of relevant mitigation actions</u> to reduce those risks in order to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more a <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment and the outcome of previous <u>monitoring results</u>.</p> <p><u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u></p>		<p>methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.</p>
3.11.4.5	PC1 – 10564	<p>AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently</u>. Sub-catchment planning..."</p>	Allow in part	<p>South Waikato District Council supports a sub catchment approach to managing the four contaminants.</p>

NEW ZEALAND FOREST OWNERS ASSOCIATION INC [Submitter 73524]

Venise Comfort

Level 9, 93 The Terrace

Wellington 6143

Table 1.

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
General	PPC1 – 9952	<p>AMEND PPC1 provisions to enable the social, economic and cultural well-being of the Waikato community AND AMEND to promote the sustainable management of resources and not be contrary to Part 2 and other provisions of the Resource Management Act AND AMEND to the most appropriate way of meeting PPC1 Objectives, and means of exercising the Council's function, having regard to the efficiency and effectiveness of the Provisions relative to other means. AND MAKE any consequential amendments.</p>	Allow	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Policy 4: Enabling activities with lower discharges to continue	PC1 – 9956	AMEND Policy 4 to enable low discharge land uses such as forestry. Ensure that mitigation actions are applied to all farming activities taking into account relative contributions and risk. AND MAKE any consequential amendments.	Allow in part	South Waikato District Council supports a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.
Policy 6: Restricting land use change	PC1 – 9957	DELETE Policy 6 AND MAKE any consequential amendments.	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • supports an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
Policy 7: Preparing for	PC1 – 9958	RETAIN Policy 7.	Allow in part	South Waikato District Council supports:

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
allocation in the future		AND AMEND to include a clearer transition toward a non-grandparented approach to allocation within the life of PPC1 to create certainty for land users. AND make any consequential amendments.		<ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • supports an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
3.11.4: Implementation methods	PC1 – 9953	AMEND PPC1 Methods (3.11.4) to provide an equitable regulation of diffuse sources of contaminants that requires the internalisation of adverse effects. This should include appropriate rules to control those activities and land uses that are contributing the most contaminants to the Waikato and Waipā rivers and reduce their contaminant loading.	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
		<p>AND AMEND to ensure that land use is not 'frozen', even on an interim basis</p> <p>AND AMEND to provide that if an allocation regime is to be adopted in future it should be based on a consistent foundation (such as Land Use Capability) treating all land consistently.</p>		<p>realistic timeframes for reporting and deadlines for compliance.</p> <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • supports an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
<p>3.11.5.3 Permitted Activities – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>PC1 – 9959</p>	<p>REPLACE Rule 3.11.5.3 with appropriate rules to address those activities that are contributing most to water quality degradation.</p> <p>AND any consequential amendments.</p>	<p>Allow in part</p>	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • supports an evaluation that can satisfy section 32 RMA to inform decision-

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
3.11.5.4	PC1 – 9961	DELETE reference to Nitrogen Reference Points as a method for assessing compliance AND any consequential amendments.	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • supports methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
3.11.5.7: Non-Complying Activity Rule – Land Use Change	PC1 – 9962	DELETE Rule 3.11.5.7. AND REPLACE it with robust Best Practical Option based rules that require those causing the adverse effects associated with their activities to avoid, remedy or mitigate those activities. AND make any consequential amendments.	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with

PLAN PROVISION	SUBMISSION ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
				<p>realistic timeframes for reporting and deadlines for compliance.</p> <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.

Trinity Lands Limited [Submitter ID 72608]

Attn: Andrew Archer and Ian Elliot

10 Neal Street

Putāruru 3443

Table 1

PLAN PROVISION	SUBMISSION POINT ID	WRC SUMMARY OF SUBMISSION POINT	ALLOW/ DISALLOW IN FULL/ IN PART	REASONS
Objective 2	PC1-9755	AMEND PPC1 so that it balances the protection of both the river and the socio-economic viability of regional communities AND CONSIDER the modelled Scenario 3 as a more acceptable solution for balancing people, economy and environment and for achieving the requirements of the National Policy Statement for Freshwater Management AND AMEND Table 3.11-1 to what is achievable under Scenario 3 Modelling.	Allow in Part	South Waikato District Council supports: <ul style="list-style-type: none">• methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 6	PC1-9767	DELETE Policy 6 AND REPLACE it with " <u>Land use change will be a Permitted Activity subject to Farm Environment Plans that can demonstrate the environment is not negatively impacted by this change.</u> "	Allow	South Waikato District Council supports: <ul style="list-style-type: none">• effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.• methods of implementation that are affordable to land owners and communities and minimises the impacts on the social,

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				economic and cultural well-being of communities.
Schedule B	PC1-9782	AMEND Schedule B(f) reference period to allow the Nitrogen Reference Point to be calculated from any year from 2011 to 2016 at landholders discretion.	Allow in Part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance.

Fonterra Co-operative Group Ltd [Submitter ID 74057]

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General	PC1-10451	AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently throughout PPC1, differentiating clearly and consistently between: 1. The long-term (80 year) desired outcomes and the short-term outcomes (being the freshwater objectives for the purpose of the National Policy Statement for Freshwater Management); and 2. The concepts of freshwater objective, attribute state and a limit or target. AND AMEND all references to 'short term objectives' to read: "short term freshwater objectives" AND AMEND all references to 'long term freshwater objectives' to read: "long term freshwater objectives" AND make such other changes as necessary to AMEND reference to 'water quality attribute^ targets^' or 'water quality attribute^ limits^' to read "water quality attribute states" or, where the context requires, to Objective 1 and/or Objective 3. AND	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.

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		AMEND to ensure all amendments to both the English text and Māori translation. AND AMEND to provide for any consequential or alternative relief to give effect to the relief sought in the submission. AND AMEND, RETAIN and DELETE the provisions as set out in the submission.		
Area covered by Chapter 3.11	PC1-11254	AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term desired outcomes and the short term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.
Water quality and National Policy Statement for Freshwater Management	PC1-11255	AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.	Allow	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices.
Objective 2: Social, economic and cultural wellbeing is	PC1-10457	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • methods of implementation that are affordable to land owners and communities and minimises

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maintained in the long term		Waikato River catchment, which and the <u>restoration and protection is undertaken in a way and at a rate that enables the people and communities to continue to provide for their social, economic and cultural well-being.</u> "		the impacts on the social, economic and cultural well-being of communities.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10469	AMEND Policy 1 so the policy test that applies to the enablement of low discharging activities is consistent with Policy 4, amend to read: "...a) Enabling activities with a low level of contaminant discharge to water bodies <u>consistent with Policy 4</u> provided those discharges do not increase ; and..."	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12759	REPLACE Policy 2 part d to read: " <u>...d. Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the property or enterprise....</u> "	Allow in part	South Waikato District Council supports: <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises

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				the impacts on the social, economic and cultural well-being of communities.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10471	<p>AMEND Policy 4 to read: "Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future...Manage sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that cumulatively the achievement of Objective 3 is not compromised. Activities and uses currently defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met. <u>Enable existing and new farming that individually and collectively make a minor contribution to contaminant loads and/or that pose a low risk of increased contaminant discharge because the activities:</u></p> <p><u>a. Occupy a small land area; and/or</u> <u>b. Have a low nitrogen discharge per hectare (and/or the land is not used for an intensive farming use); Provided that</u></p>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sub catchment approach to managing the four contaminants. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.

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		<p><u>high risk diffuse discharge practices are avoided."</u></p> <p>AND ADD a NEW Policy 4A to read: "<u>Policy 4A: Signalling further change by lower discharging activities may be required in the future. Recognise that lower discharging activities may need to take additional mitigation actions to reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens after 2026 in order for Objective 1 to be met."</u></p> <p>AND ADD a NEW Policy 4AB to read: "<u>Policy 4AB: Enabling farming activities managed in accordance with industry schemes. Enable existing farming activities that have a low risk of increased contaminant discharge for their farming type and/or a likelihood of diffuse discharge reductions over time because: a. They are part of an industry scheme designed to manage diffuse discharge risk; and b. In accordance with that industry scheme the diffuse nitrogen discharge by those properties whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value for the relevant freshwater management unit^."</u></p>		

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Policy 6: Restricting land use change	PC1-10473	DELETE Policy 6 and REPLACE to read: <u>"...Manage the potential for increases in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by generally only allowing land use change where it would: a. Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or b. Promote the implementation of Policy 16."</u>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • a sensible, practical, certain, fair and simple implementation regime with realistic timeframes for reporting and deadlines for compliance. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities. • an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
Policy 7: Preparing for allocation in the future	PC1-10474	REPLACE Policy 7 to read: <u>"Policy 7: Preparing for enhanced future water quality management Gather information (including through modelling) and undertake research about discharges and contaminant loads in the Waikato and Waipā catchments to enable future policy making that can most effectively and efficiently achieve reductions in nitrogen, phosphorus, sediment and</u>	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

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		<u>E.coli beyond those identified in Objective 3.</u> "		<ul style="list-style-type: none"> an evaluation that can satisfy section 32 RMA to inform decision-making that the Plan Change and or alternative approaches are fit for purpose to promote sustainable management of natural and physical resources.
Policy 10: Provide for point source discharges of regional significance	PC1-10598	AMEND Policy 10 to read: "Policy 10: Provide for Point Source Discharge from activities of regional significance/.... When deciding resource consent applications for Point Source Discharge of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, subject to Policy 11 and Policy 12, provide for the:..."	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-10601	AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to Point Source Discharge. AND ADD a NEW Policy 11A to read: "Policy 11A: Offsetting the effects of Point Source Discharge	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.
Policy 13: Point sources consent duration	PC1-10610	AMEND Policy 13 to read: "Policy 13: Point sources consent duration When determining an appropriate duration for any consent granted consider the following matters: a. A consent term	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.

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		exceeding 25 years, where the application demonstrates that Policies 11, 11A and 12 will be met complied with; and..."		
Additions to Glossary of Terms	PC1-10616	ADD to the Glossary of terms a definition of regionally significant infrastructure to read: "Regionally Significant Infrastructure – means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes: a. Dairy manufacturing sites; b. Meat processing plants; c. Pulp and paper processing plants; and d. Mineral extraction activities."	Allow in part	<p>South Waikato District Council supports:</p> <ul style="list-style-type: none"> • effects-based provisions that accommodate changes in land use activity, provide for multiple land use opportunities and diversification, and can be supported by sustainable land management practices. • methods of implementation that are affordable to land owners and communities and minimises the impacts on the social, economic and cultural well-being of communities.